

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS

SUPERIOR COURT

Docket No. 03-E-0106

In the Matter of the Liquidation of  
The Home Insurance Company

AFFIDAVIT OF DAWN S. PITTMAN

2009 NOV - 9 P 2:58  
NH SUPERIOR COURT  
MERRIMACK COUNTY  
CONCORD, NH

I, Dawn S. Pittman, hereby depose and say:

1. I am an attorney licensed to practice law in the State of California. I am partner with the law firm of Morgan, Lewis & Bockius LLP and counsel of record for Plaintiffs Fuller-Austin Asbestos Settlement Trust, Fuller-Austin Insulation Co., Kraft Foods Global, Inc., National Dairy Products Corporation, Kraftco Corporation, Kraft, Inc., General Foods Corporation, Nabisco Brands Co., Publicard, Inc., Somerset Oil Inc., Southland Oil Company, Ohio Edison Company, Pennsylvania Power Company, The Cleveland Electric Illuminating Company, Toledo Edison Company, ITT Corporation f/k/a ITT Industries, Inc., Swan Transportation Company, Swan Asbestos & Silica Settlement Trust, Monongahela Power Company, West Penn Power Company, Rohm and Haas Co., Deere & Co., and The Potomac Edison Company; Plaintiffs Western Asbestos Settlement Trust, Western Mac Arthur Company, Mac Arthur Company, and Western Asbestos Company; Plaintiffs PepsiAmericas, Inc., Southern Natural Gas Company, El Paso Production Company, Petro-Tex Chemical Corporation Dissolution, Distribution, Liquidating and Recovery Trust, and Tennessee Gas Pipeline Company; and Plaintiff Pneumo Abex LLC (collectively, "Policyholder Plaintiffs").

2. I have personal knowledge of the facts set forth in this declaration, and if called as a witness, I could and would testify competently as to those facts.

3. The Phase One trial in the *Fuller-Austin Asbestos Settlement Trust v. Zurich American Insurance Company*, *Western Asbestos Settlement Trust v. Zurich American Insurance Company*, *PepsiAmericas, Inc. v. Zurich American Insurance Company*, and *Pneumo Abex LLC v. Zurich American Insurance Company* (the “Zurich Litigation”) pending in California is expected to be set for trial during the summer 2010 or as soon thereafter as the trial court’s schedule permits. Attached hereto as Exhibit 1 is a true and correct copy of the Stipulation and Order Bifurcating Certain Issues for Court Trial, signed by Judge Richard Kramer on or about December 16, 2008 (including, as Exhibit 1 thereto, the Stipulation and Order Regarding Fraudulent Transfer Claims, which describes the alleged asset transfers that are at issue in the Phase One trial).

4. Before sending a request for 33 categories of documents to the Home in Liquidation on August 25, 2009, the Policyholder Plaintiffs engaged in repeated good faith efforts to develop a joint document request with the defendants in the Zurich Litigation. Unfortunately, these efforts were unsuccessful.

5. After sending the request to the Home in Liquidation, the Policyholder Plaintiffs engaged in several telephonic and meet-and-confer efforts with counsel for the Commissioner. As a result, the Policyholder Plaintiffs and the Commissioner reached agreement regarding most of the requests at issue. A true and correct copy of the Commissioner’s October 21, 2009 letter regarding this agreement is attached hereto as Exhibit 2.

6. A true and correct copy of the Policyholder Plaintiffs’ October 23, 2009 letter regarding the agreement is attached hereto as Exhibit 3.

7. A true and correct copy of the California Deposition Subpoena for

Production of Business Records, issued to Risk Enterprise Management, Ltd. ("REM") on or about June 8, 2007, is attached hereto as Exhibit 4.

8. On or about September 3, 2009, REM transmitted to the Policyholder Plaintiffs a privilege and redaction log for the documents it produced pursuant to the June 8, 2007 subpoena. A true and correct copy of the privilege and redaction logs is attached hereto as Exhibit 5.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 9th day of November, 2009 at San Francisco, California.

  
Dawn S. Pittman

1 MORGAN, LEWIS & BOCKIUS LLP  
 2 Paul A. Zevnik, State Bar No. 75343  
 3 Michel Y. Horton, State Bar No. 114243  
 4 Benjamin P. Smith, State Bar No. 197551  
 5 One Market, Spear Street Tower  
 6 San Francisco, California 94105  
 7 Tel: (415) 442-1000  
 8 Fax: (415) 442-1001  
 9 *Attorneys for Plaintiffs in Case Nos. CGC-04-431719,*  
 10 *CGC-04-436181, and CGC-05-442140*

ENDCRSEU  
 FILED  
 San Francisco County Superior Court

DEC 16 2008

GORDON PARK-II, Clerk  
 J. ROSE-MERLA  
 Deputy Clerk

11 JONES DAY LLP  
 12 Deanna L. Johnston, State Bar No. 198017  
 13 555 California Street, 26th Floor  
 14 San Francisco, California 94104  
 15 Tel: (415) 626-3939  
 16 Fax: (415) 875-5700  
 17 *Attorneys for Plaintiffs in Case No. CGC-05-442745*

18 QUINN EMANUEL URQUHART OLIVER & HEDGES, LLP  
 19 Albert P. Bedcarré, State Bar No. 148178  
 20 Peter Klivans, State Bar No. 236673  
 21 50 California Street, 22<sup>nd</sup> Floor  
 22 San Francisco, California 94111  
 23 Tel: (415) 875-6600  
 24 Fax: (415) 875-6700  
 25 *Attorneys for Defendants*

16 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
 17 COUNTY OF SAN FRANCISCO

19 FULLER-AUSTIN ASBESTOS SETTLEMENT  
 20 TRUST, *et al.*,

21 *Plaintiffs,*

22 vs.

23 ZURICH-AMERICAN INSURANCE  
 24 COMPANY, individually and as successor to  
 25 Zurich Insurance Company, *et al.*,

26 *Defendants.*

Case No. CGC 04-431719  
 Case No. CGC 04-436181  
 Case No. CGC 05-442140  
 Case No. CGC 05-442745

27 **STIPULATION AND ~~PROPOSED~~**  
 28 **ORDER BIFURCATING CERTAIN**  
**ISSUES FOR COURT TRIAL**

Dept. 304  
 Judge: Hon. Richard A. Kramer

1 WESTERN ASBESTOS SETTLEMENT TRUST,  
2 *et al.*,

3 *Plaintiffs,*

4 vs.

5  
6 ZURICH-AMERICAN INSURANCE  
7 COMPANY, individually and as successor to  
8 Zurich Insurance Company, *et al.*,

9 *Defendants.*

10 PEPSIAMERICAS, INC., *et al.*,

11 *Plaintiffs,*

12 vs.

13 ZURICH-AMERICAN INSURANCE  
14 COMPANY, individually and as successor to  
15 Zurich Insurance Company, *et al.*,

16 *Defendants.*

17 PNEUMO ABEX LLC,

18 *Plaintiff,*

19 vs.

20 ZURICH-AMERICAN INSURANCE  
21 COMPANY, individually and as successor to  
22 Zurich Insurance Company, *et al.*,

23 *Defendants.*

24 **STIPULATION**

25 Plaintiffs in the above-captioned cases ("Plaintiffs") and defendants Zurich Insurance  
26 Company, American Zurich Insurance Company, Zurich-American Insurance Company, Zurich-  
27 American Insurance Company of Illinois, Guarantee and Liability Insurance Company, Orange  
28 Stone Reinsurance Company, and Steadfast Insurance Company ("Defendants") hereby stipulate  
that the following issues ("Phase One Trial Issues") may be adjudicated in a bifurcated court trial  
("Phase One Trial") pursuant to California Code of Civil Procedure § 598:

-2-

STIPULATION AND ~~PROPOSED~~ ORDER BIFURCATING CERTAIN ISSUES FOR COURT TRIAL

1 Issue No. 1. Choice of Law

2 What law applies to the resolution of Issues 2-4 below?

3  
4 Issue No. 2. Alleged Transfers

5 As to each Item on Exhibit 1 of this Stipulation:

- 6 A. What are the alleged assets and alleged obligations involved?
- 7 B. For each Item on Exhibit 1, was any asset of Home transferred by Home to
- 8 any Defendant under applicable law?
- 9 C. For each Item on Exhibit 1, was any obligation incurred by Home under
- 10 applicable law?

11  
12 Issue No. 3. Statute of Limitations:

- 13 A. Are any of plaintiffs' Phase I claims barred by any applicable statutes of
- 14 limitation or statutes of repose?

15  
16 Issue No. 4. Regulatory Action:

- 17 A. What are the effects, if any, of any action taken by the New Hampshire
- 18 Insurance Department or any other governmental entity on plaintiffs' Phase
- 19 I claims?

20 All claims and defenses other than the Phase One Trial Issues are reserved for future

21 adjudication.

22 IT IS SO STIPULATED:

23 Dated: December 16, 2008

MORGAN, LEWIS & BOCKIUS, LLP

24  
25 By 

26 Benjamin P. Smith  
27 Attorneys for Plaintiffs in the Fuller-Austin,  
Western Asbestos, and PepsiAmericas cases

1 Dated: December 16 2008

JONES DAY LLP

2  
3 By 

~~Deanna L. Johnston~~  
*Attorneys for Plaintiff in the Pneumo Abex case*

4  
5 Dated: December 16 2008

6 QUINN EMANUEL URQUHART  
7 OLIVER & HEDGES, LLP

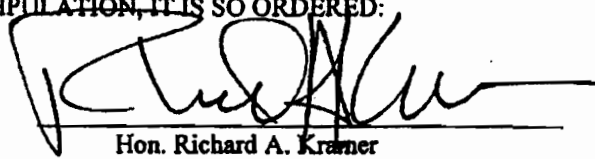
8 By 

9 Albert P. Bedecarre  
10 *Attorneys for Defendants in the Fuller-Austin,*  
11 *Western Asbestos, PepsiAmericas, and Pneumo*  
12 *Abex cases*

13 **ORDER**

14 PURSUANT TO THE FOREGOING STIPULATION, IT IS SO ORDERED:

15  
16 Dated: 12/16 2008



Hon. Richard A. Kramer  
Judge of the Superior Court

**Exhibit 1**



1 MORGAN, LEWIS & BOCKIUS LLP  
2 Paul A. Zevnik, State Bar No. 75343  
3 Michel Y. Horton, State Bar No. 114243  
4 Benjamin P. Smith, State Bar No. 197551  
5 One Market, Spear Street Tower  
6 San Francisco, California 94105  
7 Tel: (415) 442-1000  
8 Fax: (415) 442-1001  
9 *Attorneys for Plaintiffs in Case Nos. CGC-04-431719,*  
10 *CGC-04-436181, and CGC-05-442140*

11 JONES DAY LLP  
12 Deanna L. Johnston, State Bar No. 198017  
13 555 California Street, 26th Floor  
14 San Francisco, California 94104  
15 Tel: (415) 626-3939  
16 Fax: (415) 875-5700  
17 *Attorneys for Plaintiffs in Case No. CGC-05-442745*

18 QUINN EMANUEL URQUHART OLIVER & HEDGES, LLP  
19 Albert P. Bedcarré, State Bar No. 148178  
20 Peter Klivans, State Bar No. 236673  
21 50 California Street, 22<sup>nd</sup> Floor  
22 San Francisco, California 94111  
23 Tel: (415) 875-6600  
24 Fax: (415) 875-6700  
25 *Attorneys for Defendants*

26 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
27 COUNTY OF SAN FRANCISCO

28 FULLER-AUSTIN ASBESTOS SETTLEMENT TRUST, *et al.*,

*Plaintiffs,*

vs.

ZURICH-AMERICAN INSURANCE COMPANY, individually and as successor to Zurich Insurance Company, *et al.*,

*Defendants.*

ENDORSED  
FILED  
San Francisco County Superior Court

FEB 16 2008

GORDON PARK-LI, Clerk  
By J. Rios - MERITA  
Deputy Clerk

Case No. CGC 04-431719  
Case No. CGC 04-436181  
Case No. CGC 05-442140  
Case No. CGC 05-442745

STIPULATION AND ~~PROPOSED~~  
ORDER REGARDING  
FRAUDULENT TRANSFER  
CLAIMS

Dept. 304  
Judge: Hon. Richard A. Kramer

1 WESTERN ASBESTOS SETTLEMENT TRUST,  
2 *et al.*

3 *Plaintiffs,*

4 vs.

5 ZURICH-AMERICAN INSURANCE  
6 COMPANY, individually and as successor to  
7 Zurich Insurance Company, *et al.*

8 *Defendants.*

9 PEPSIAMERICAS, INC., *et al.*

10 *Plaintiffs,*

11 vs.

12 ZURICH-AMERICAN INSURANCE  
13 COMPANY, individually and as successor to  
14 Zurich Insurance Company, *et al.*

15 *Defendants.*

16 PNEUMO ABEX LLC.

17 *Plaintiff,*

18 vs.

19 ZURICH-AMERICAN INSURANCE  
20 COMPANY, individually and as successor to  
21 Zurich Insurance Company, *et al.*

22 *Defendants.*

23 Plaintiffs Fuller-Austin Asbestos Settlement Trust, Fuller-Austin Insulation Company,  
24 Kraft Foods Global, Inc., National Dairy Products Corporation, Kraftco Corporation, Kraft, Inc.,  
25 General Foods Corporation, Nabisco Brands Co., Nicor, Inc., Northern Illinois Gas Company,  
26 PubliCard, Inc., Somerset Oil, Inc., Southland Oil Company, Ohio Edison Company,  
27 Pennsylvania Power Company, The Cleveland Electric Illuminating Company, Toledo Edison  
28 Company, HTT Corporation, Swan Transportation Company, Swan Asbestos & Silica Settlement  
Trust, Monongahela Power Company, West Penn Power Company, the Potomac Edison  
Company, Rohm and Haas Company, Deere & Company, Western Asbestos Settlement Trust,

0112209279743

-2-

STIPULATION AND [PROPOSED] ORDER

1 Western Mac Arthur Company, Mac Arthur Company, Western Asbestos Company, Plaintiffs  
2 PepsiAmericas, Inc., Southern Natural Gas Company, El Paso Production Company, Petro-Tex  
3 Chemical Corporation Dissolution, Distribution, Liquidating, And Recovery Trust, Tennessee  
4 Gas Pipeline Company, and Pneumo Abex LLC ("Plaintiffs") and Defendants Zurich Insurance  
5 Company, American Zurich Insurance Company, Zurich-American Insurance Company, Zurich-  
6 American Insurance Company of Illinois, Guarantee and Liability Insurance Company, Orange  
7 Stone Reinsurance Company, and Steadfast Insurance Company ("Defendants") hereby stipulate,  
8 subject to the approval of the Court, as follows:

9  
10 1. The chart attached hereto as Exhibit A depicts the items Plaintiffs contend are the  
11 asset transfers and obligations incurred by the Home that support Plaintiffs' fraudulent  
12 conveyance causes of action in the above-referenced proceedings. Absent stipulation of the  
13 parties, or approval of the Court upon a showing of good cause, Plaintiffs cannot assert additional  
14 asset transfers or obligations incurred to support their causes of action for fraudulent conveyance.

15 2. Plaintiffs reserve the right to supplement and modify all other aspects of  
16 Exhibit A, including (without limitation) the list of transferees, the date(s) of transfers, the value  
17 of the assets transferred, and potentially applicable state laws.

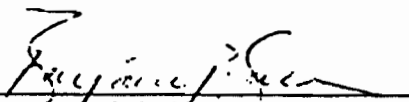
18 3. Defendants do not acknowledge, agree or stipulate to the truth or validity of  
19 Exhibit A, or to any matter stated in Exhibit A.

20 4. The Parties agree that this Stipulation and the attached Exhibit A shall not  
21 constitute evidence of any of the matters stated in Exhibit A, and the Parties shall not offer them  
22 as evidence of any matter stated in Exhibit A.

23 IT IS SO STIPULATED:


24 Dated: December 16, 2008

MORGAN, LEWIS & BOCKIUS, LLP

25 By   
26 Benjamin P. Smith  
27 Attorneys for Plaintiffs in the Fuller-Austin,  
28 Western Asbestos, and PepsiAmericas cases

1 Dated: December 16, 2008

QUINN EMANUEL URQUHART  
OLIVER & HEDGES

2  
3 By   
4 Albert Bedecarre  
5 Attorneys for Defendants in the Fuller-Austin,  
6 Western Asbestos, PepsiAmericas, and Pneumo  
7 Abex cases

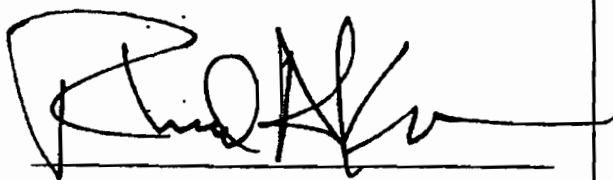
8 Dated: December 16, 2008

JONES DAY

9 By   
10 Deanna Johnston  
11 Attorneys for Plaintiff in the Pneumo Abex case

12 IT IS SO ORDERED:

13 Dated: 12/16, 2008

14   
15 Hon. Richard A. Kramer

# Exhibit A

Exhibit Transfer

Item	Assets Transferred From Home to Zurich (Detailed Characterization in Book and Index)	Zurich Transferees	Date(s) of Transfer(s)	Consideration Paid to Home By Zurich Transferees	Value of Assets Transferred	Potentially Applicable Law
1	Insurance Renewal Rights Premium Revenue ("Home's Book of Business")	Zurich Insurance Company	2004:	None	\$1,379,618,930	California Illinois New York
	Pursuant to the December 24, 1994 Facilitative Reinsurance Facility Agreement and a February 6, 1995 amendment thereto, existing policyholders of the Home Insurance Company were offered faculative reinsurance certificates from Zurich Insurance Company or, alternatively, replacement policies from Zurich and its affiliates in place of their existing Home policies. Later, pursuant to a June 12, 1995, Renewal Rights Agreement, Home ceased writing any new or renewal insurance business, and was contractually required to assist Zurich and its affiliates in assisting Home's book of business to that time of the Renewal Rights Agreement, Home's book of business generated approximately \$2.4 billion in annual premiums. The Chief Executive of Zurich American Insurance Group testified that, pursuant to the Renewal Rights Agreement, "about a billion dollars of [Home's] business will be moving to Zurich."	Zurich American Insurance Company Zurich American Insurance Company of Illinois Standard Insurance Company American Zurich Insurance Company American Guarantee and Liability Insurance Company	2003: 2002: 2001: 2000: 1999: 1998: 1997: 1996: 1995: TOTAL		\$1,295,418,828 \$1,156,822,166 \$974,407,891 \$890,223,930 \$813,516,647 \$619,250,400 \$918,600,000 \$600,000,000 \$600,000,000 \$9,536,866,780	

Because Zurich and the Zurich-American Insurance Pool thereafter ceased reporting the premiums received from their renewals of Home policies, and Zurich now contends that premiums received pursuant to former Home policies cannot be segregated from other premium income, the value of the asset for years after 1995 was determined by the average net rate of growth in commercial lines policy premiums as reported by Best's between 1997 and 2004. Benchmarking of these annual growth rates against the performance of the Zurich-American pool indicates that the rate of growth used for purposes of this asset valuation is conservative.

FOR DISCUSSION PURPOSES ONLY. NOT EVIDENCE.

Item	Asset(s) Transferred From Home to Zurich (Semantic Characterization in Bold and Italics) <sup>1</sup>	Zurich Transferees	Date(s) of Transfer(s) <sup>2</sup>	Consideration Paid to Home By Zurich Transferees	Value of Assets Transferred	Potentially Applicable Law
2	"Turnkey" U.S. Domestic Insurance Company ("Turnkey Operations") Pursuant to the Jun 12, 1985 Renewed Rights Agreement, Services Agreement, and Employee Transition Agreement, as well as other ancillary agreements, Zurich obtained the existing insurance operations of a United States-based insurer, including Home's books and records, computer systems, business, offices (Zurich American Insurance Group obtained Home's offices at 8200 Keystone Crossing in Indianapolis, IN; 60 State Street in Boston, MA; 2101 Harvard Road in Charlotte, NC; 264 Venable Road in Parkers Park, NJ, and opened dozens of new offices following the so-called "Reacquisition"), relationships and contracts with agents and brokers, and other infrastructure for both claims handling and underwriting aspects of Home's business. Zurich American Insurance Company also obtained approximately 800 former Home employees, while Zurich affilia REA "severed" 1464 former Home employees, and eventually converted them to REA employees, for purposes of assuring continuity in Home's claims handling operations.	Zurich Insurance Company <sup>3</sup> Zurich American Insurance Company Zurich American Insurance Company of Illinois Standard Insurance Company American Zurich Insurance Company American Guaranties and Liability Insurance Company Risk Enterprise Management Ltd	1995 1996 1987 1998 1999 2000	None <sup>4</sup>	\$123,480,000 \$30,480,000 \$31,120,090 \$31,213,440 \$30,994,946 \$33,536,532	California Illinois Indiana Massachusetts New Jersey New York
TOTAL:					\$280,904,998	

The value of Home's Turnkey Operations is measured by the capital cost savings Zurich obtained by creating the business of an existing new insurance company in the United States (including costs associated with obtaining state licenses, recruiting fees, real estate and leases, signing up brokers and independent agents, computing state filings, etc.) and a resulting vehicle cost savings advantage through at least the year 2000, and as detailed in the "Value of Asset Transferred" column at right.

DBJZ00013574

EXHIBIT A

Item	Asset(s) Transferred From Home to Zurich (Generic Characterization in Bold and Italic)	Zurich Transferees	Date(s) of Transfer(s)	Consideration Paid to	Value of Assets Transferred	Potentially Applicable	
				Home By Zurich Transferees		Law	
3	Possession and Use of Home's Invested Assets of \$3,277,207,508 With 7.5% Rate of Return As Opposed to 12% Market Rate of Return* ("Possession and Use of Home's Capital")	Pursuant to the (1) June 12, 1985 Portfolio Value Swap Agreements as well as March 28, 1987 amendments thereto, (2) the April 1, 1986 Investment Portfolio Agreement, (3) the February 29, 2000 Supplemental Portfolio Value Swap Agreement, and (4) and the 2003 Transition Agreement, Zurich affirms itself as the holder over Home's \$3.3 billion portfolio, defined under the Agreements to include all cash and securities owned by a Home Entity or by any U.S. domiciled insurance or reinsurance subsidiary of Home Holdings, Inc. Moreover, pursuant to the Agreements, Home and Transferee Orange Stone Reinsurance Company exchanged payments based upon the positive or negative difference, as the case may be, between the actual total return on Home's portfolio and 7.5% (net of asset management fees). Home agreed to pay annually to Orange Stone any positive difference between the actual total return on its portfolio and the 7.5% target total return (net of asset management fees charged by Orange Stone), i.e., Home's return was guaranteed and capped at 7.5%. The target total return of 7.5% was 4.5% less than what Home was required to pay third parties on Home's under subcontracted debt, less than Zurich affirms expected to earn through the management of Home's portfolio, and approximately 4.5% less than the average rate of return on capital for similar-sized insurance companies during the relevant time period.	Zurich Insurance Company <sup>7</sup> Orange Stone Reinsurance Company ("Orange Stone") <sup>7</sup>	6/12/1985 Through	Home By Zurich Transferees	\$36,262,274 \$83,532,984 \$38,440,566 \$35,882,077 \$29,085,134 \$29,142,435 \$30,427,734 \$31,672,836 \$344,488,111	California New York
				6/30/1985			
				7/1/1986 through			
				6/30/1986			
				7/1/1986 through			
				6/30/1987			
				7/1/1987 through			
				6/30/1988			
				7/1/1988 through			
				6/30/1989			
7/1/1989 through							
6/30/2000							
7/1/2000 through							
6/30/2001							
7/1/2001 through							
6/30/2002							
TOTAL:							

The value of the asset is currently measured by the differential between Home's payments to third parties and Zurich's capped return of 7.5% on Home's declining capital base, as reported by Home Holdings in its publicly-available filings and internal reports. At present, the calculation does not include any benefit or value Zurich extracted from its ability to manage and invest over \$3.3 billion in assets.



Asset(s) Transferred From Home to Zurich (Semantic Characterization in Bold and Italics)	Zurich Transferee	Date(s) of Transfer(s)	Consideration Paid to Home by Zurich Transferee	Value of Assets Transferred	Potentially Applicable Law
<b>Deferral of XL Reinsurance Payments ("Reinsurance Deferral")</b>	<b>Orange Stone Reinsurance Company ("Orange Stone")</b>	8/12/1995 Through 8/30/1995	None	\$22,340,652	California New York
<b>Reinsurance treaty entered into as the Aggregate Excess of Loss Cover ("Stop Loss Treaty") that was amended in 1993, as well as, on information and belief, other reinsurance agreements whereby Zurich assumes provided reinsurance to Home. In June 1995, pursuant to the Aggregate Excess of Loss Reinsurance Agreement ("AEOLA") and the Commission Agreement, Zurich's existing reinsurance obligations under the Stop Loss Treaty (with a face value of \$590 million) were assumed and replaced by the obligations of the AEOLA (with a face value of approximately \$1.3 billion). The AEOLA was triggered only when Home had no remaining cash or assets readily converted to cash. This allowed Zurich to defer reinsurance payments to Home until Home's assets were depleted and only in the event that Home was liquid and unable to pay claims.</b>	<b>Zurich Insurance Company</b>	7/1/1995 through 8/30/1996 7/1/1996 through 6/30/1997 7/1/1997 through 8/30/1998 7/1/1998 through 8/30/1998	None	\$93,661,049 \$100,707,128 \$108,260,162 \$108,018,845	
<b>Testimony received in connection with the New Hampshire hearings questioned whether any additional value was provided to Home through the AEOLA in place of the Stop Loss Treaty. Patrick Gramman of Allstate &amp; Robertson testified that the Stop Loss Treaty was worth more than the AEOLA, even though the AEOLA had a greater face value. Similarly, Home Holdings, Inc.'s CFO and Chief Actuary testified that the AEOLA was economically the same as the Stop Loss Treaty it replaced. The Stop Loss Treaty was only for the benefit of policyholder claims, while the AEOLA could be used to pay on almost any of Home's obligations, including dividend payments.</b>		7/1/1999 through 8/30/2000 7/1/2000 through 8/30/2001 7/1/2001 through 8/30/2002 7/1/2002 through Termination of Agreement		\$86,040,455 \$73,885,535 \$57,623,207 \$37,864,166	
<b>The benefit obtained by Zurich and its affiliates is measured by the value (netted at a rate of 7.5%) obtained by receiving AEOLA funds that would have otherwise been paid to Home over time, and taking into account reinsurance payments made pursuant to the AEOLA and the declining amount of available reinsurance funds under the AEOLA. Figures are derived from Home Insurance Quarterly Financial Reports.</b>		TOTAL:		\$492,251,200	

Asaeg) Transferred From Home to Zurich  
(Germanic Characteristics in Bond and Policy)

Item	Consideration Paid to Home By Zurich Transferees	Date(s) of Transfer(s)	Value of Assets Transferred	Parasitic by Applicable Law
<p>Item 5                      Commutation of Fights and No-Aggregate Reinsurance Contracts in Exchange for Fights Reinsurance Contract ("Fights Reinsurance")</p> <p>The Home and various Zurich affiliates were parties to a 1981 reinsurance treaty known as the Aggregate Excess or Loss Cover ("Stop Loss Treaty") that provided for at least \$2 billion in reinsurance coverage. On information and belief, Zurich and its affiliates also provided additional reinsurance to Home through other reinsurance policies that have not been produced, including reinsurance that - like Home's primary policies - had no aggregate limit for some or all of the asbestos claims at issue. The Stop Loss Treaty was amended in 1993 to reduce the available limit to \$500 million. In June 1995, pursuant to the Aggregate Excess of Loss Reinsurance Agreement ("AECOLA") and the Commutation Agreement, Zurich's existing reinsurance obligations under the Stop Loss Treaty (with a face value of \$500 million) were assumed and replaced by the obligations of the AECOLA (with a face value of approximately \$1.3 billion).</p> <p>The consideration paid to Home reflects the appropriate difference between the face value of the Stop Loss Treaty and the AECOLA. The value received by Zurich and its affiliates as a result of the commutations includes the amount of cash and assets that Home was required to consume before obtaining reinsurance under the AECOLA plus all losses payable under Home policies that not yet paid given Home's lack of sufficient reinsurance to pay policyholders.</p>	Zurich Insurance Company <sup>7</sup>	1995-present	\$718,424,731	California New York
			\$3,277,207,908 - what remained of Home's invested assets at termination (\$422,674,772) + \$2,854,533,137 + all other losses payable under Home policies	

Item	Consideration Paid to Home By Zurich Transferees	Date(s) of Transfer(s)	Value of Assets Transferred	Parasitic by Applicable Law
<p>Item 6                      Commutation "Four" for Stop Loss Treaty ("Stop Loss Four")</p> <p>Pursuant to the terms of the Commutation Agreement, signed on June 12, 1995, Centre Reinsurance International Limited and Zurich International Bermuda, Ltd. each were to pay Home a commutation amount as final settlement of the Stop Loss Treaty. The total commutation was paid by Centre Reinsurance International Limited was \$185,750,000. Zurich International Bermuda, Ltd. paid approximately \$23 million, and a TRIP-Horus affiliate paid approximately \$43 million. Home, in turn, paid each of these amounts to Zurich affiliates as a fee for commutation of the Stop Loss Treaty and its consideration for the AECOLA. Thus, in exchange for reinsurance that required Home to consume all of its assets prior to payment, Home was required to pay at least an additional \$272 million to Zurich and its affiliates.</p>	Orange Stone Reinsurance Company ("Orange Stone") Zurich Insurance Company <sup>7</sup>	6/12/1995 2/31/1996 TOTAL:	None  \$228,000,000 \$41,000,000 \$272,000,000	California New York

Asset(s) Transferred From Home to Zurich (Beneficial Characterization in Bold and Italic)	Zurich Transfers to	Date(s) of Transfer(s) <sup>1</sup>	Consideration Paid to Home by Zurich Transferees	Value of Assets Transferred	Potentially Applicable Law
<p>Item 7 Reinsurance Premiums, Commissions, and Interest for Funding Facility and Cut-Through (Funding Payments)</p>	<p>Zurich Insurance Company<sup>2</sup> Zurich American Insurance Company Illinois Sheffield Insurance Company Zurich American Insurance Company</p>	<p>1995 to present</p>	<p>None</p>	<p>\$832,000,000</p>	<p>California Illinois New York</p>
<p>Pursuant to the December 24, 1994 Agreement, Zurich agreed to issue facultative reinsurance certificates for Home policies. Pursuant to the February 8, 1995 Amendment, Zurich offered direct insurance policies to Home policyholders in lieu of assumption certificates.</p>					
<p>By June 1995, approximately \$800 million in gross premium dollars had been paid by policyholders for policies issued with facultative reinsurance certificates. Zurich had issued premiums "on Home's behalf," with all interest on the funds in excess of 7.5% kept by Zurich for its own benefit. Zurich also failed to pay the full 7.5% amount due to Home, and owed Home more than \$1 million as of mid-1995.</p>					
<p>In Amendment No. 1 to the Facultative Reinsurance Facility Agreement, and in absence of the New Hampshire hearings, Zurich and its affiliates agreed to pay Home a 1% commission on insurance renewals for up to three years. In April, in the New Hampshire hearings, Zurich representatives testified that "The Home Insurance Group will receive the benefit of one-percent commission paid on all premiums to the Zurich on all renewals of policies currently written by the Home for the next three years." However, the 1% commission provision was deleted in Amendment No. 2 to the Facultative Reinsurance Facility Agreement dated June 12, 1995 and no 1% commission was ever paid to Home.</p>					
<p>The value of the asset transferred is calculated based in part upon Zurich's discovery responses, which indicate that \$800 million in gross written premium was paid by policyholders for Zurich-issued policies and that Zurich obtained \$37 million in gross reinsurance premiums for policies it issued directly. In addition, Zurich failed to pay Home over \$1 million in interest due and payable to Home, and avoided 1% commission payments. The value to Zurich of avoiding the 1% commission payment has not yet been calculated and will require additional discovery.</p>					

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EXHIBIT A

FOR DISCUSSION PURPOSES ONLY. NOT EVIDENCE.

Item	Asset(s) Transferred From Home to Zurich (Beneficial Characterization in Bold and Italic)	Zurich Transferees	Date(s) of Transfer(s)	Consideration Paid to Home By Zurich Transferees	Value of Assets Transferred	Potentially Applicable Law
8	<p><b>Starling Forest ("Starling Forest")</b></p> <p>In 1995, in connection with the so-called "recapitalization," Zurich affiliates provided a line of credit of up to \$30 million to a Home subsidiary holding the Starling Forest lands - valuable real estate close to New York City - for purposes of further development and sale of the land. The loans secured by the Starling Forest land itself, which Zurich estimated to be valued at \$120,000,000, and required annual interest payments of 10%.</p> <p>In connection with a February 18, 1997 Starling Forest Agreement, approximately 13,250 acres of land - designated "Starling Forest Series A Property" - were sold to the State of New York. "Starling Forest Series B Property," consisting of approximately 2250 acres, was set aside for other purposes, including development. Eventually, the owner of these lands, Starling Forest LLC, became a subsidiary of Zurich, thereby transferring the lands from Home to Zurich.</p> <p>Starling Forest LLC became a subsidiary of Zurich as a result of numerous mergers, reorganizations and corporate name changes, including but not limited to the following: on or about June 27, 1997, Starling Forest Corporation reorganized and changed its name to Starling Forest LLC; on August 7, 1998, Home Holdings Inc. amended its certificate of incorporation and changed its name to Zurich SF Holdings Inc.; On December 20, 1998, Zurich SF Holdings Inc. survived a merger with Zurich Meyer LLC, two days later, Zurich SF Holdings Inc. merged with, and was survived by, Zurich SF Holdings LLC; on December 20, 2004, Zurich SF Holdings LLC survived a merger with Starling Forest Management LLC. The December 20, 2004 merger between Zurich SF Holdings LLC and Starling Forest Management LLC also caused the name of the surviving domestic limited liability company to be changed to Starling Forest LLC.</p>	Zurich Insurance Company	1996-2007	None	\$120,000,000	California New York
	<p><b>Guinjal Financial Corp. ("Guinjal")</b></p> <p>As an amendment to the Portfolio Swap Agreement dated March 28, 1997, Home transferred a preferred interest in Guinjal Financial Corp. to Centile RA, a Zurich affiliate. Guinjal was sold in 1997 for approximately \$235 million.</p>	Zurich Insurance Company	1997	None	\$206,000,000	California New York

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EXHIBIT A

Item	Asset(s) Transferred from Home to Zurich (Semantic Characterization in Bold and Italics)	Zurich Transferee	Date(s) of Transfer(s)	Consideration Paid to Home By Zurich Transferee	Value of Assets Transferred	Potentially Applicable Law
10	Portfolio Profits Swap Pursuant to the Portfolio Value Swap Agreements and amendments thereto, as well as the Investment Management Agreement and December 16, 1987 assignment of the Investment Management Agreement, Home and Zurich affiliate Orange Stone Reinsurance (then Centre Reinsurance Dublin) agreed to exchange payments based upon the positive or negative difference, as the case may be, between the actual total return on Home's portfolio and 7.5%. In 1995, Home paid Centre Reinsurance Dublin \$210 million. Between 1995 and 2002, and based upon the notes to Home's Insurance Company's annual statements, the net payments from the Home to Centre Reinsurance Dublin totaled \$146,772,000 as follows: (1) 1995 - \$210 million; (2) 1996 - (\$47,878,000); (3) 1997 - (\$2,410,000); (4) 1998 - (\$448,000); (5) 1999 - (\$6,355,000); (6) 2000 - (\$2,349,000); (7) 2001 - (\$1,480,000); (8) 2002 - (\$2,350,000).	Zurich Insurance Company Orange Stone Reinsurance Company ("Orange Stone")	1995-2002	None	\$146,772,000	California New York
11	Preferential Profits from Services Agreement ("Services Agreement Profits") Pursuant to the June 12, 1985 Services Agreement, as subsequently amended in March 1987, Zurich subsidiary REIM overtook the various claims management and run-off services Home previously performed itself, and changed Home a contractual fee equivalent to approximately 15% above the actual costs of providing the services. The fee was fully deferred until the 8th anniversary of the Services Agreement, and partially deferred (in the amount of one-third of REIM's 15% margin) from the 8th through the tenth anniversary of the Services Agreement. Upon the 8th anniversary of the Services Agreement, and pursuant to Letter Agreements dated July 19, 2000 and May 6, 2003, Home began to pay, and REIM began to accept, a portion of its fees (in the amount of \$83,333.33 per month) for REIM's provision of services. Later, pursuant to the second Letter Agreement, and just prior to its placement into liquidation, Home began to pay REIM a monthly payment of \$170,000 for services provided by REIM under the Services Agreement. This calculation assumes payments stopped upon Home's liquidation, which needs to be confirmed.	Zurich Insurance Company Risk Enterprise Management Ltd.	2000-2003	None	\$3,348,887	California New York

<sup>1</sup>Subject to revision for good cause shown. All other fields on this chart are subject to change and introduction of expert testimony. Please note that discovery is not completed, some data were not available as of September 1, 2008, and, accordingly, data are subject to revision.

<sup>2</sup>Zurich Insurance Company is the parent, successor and responsible party for Zurich Home Investments Limited, previously known as ZCI Investments Limited, Centre Reinsurance Limited (Barbados), Centre Reinsurance Limited (Bermuda), and Centre Reinsurance Holdings, Ltd. Moreover, Zurich American Insurance Company is the successor to Zurich Insurance Company, U.S. Branch, i.e. Zurich Insurance Company.

<sup>3</sup>No Consideration was paid for the Turkey Operations. Zurich contends that the consideration consists of providing claims management and run-off services at cost for the period from June 13, 1995 to June 12, 2003. This is separately itemized below under the fraudulent transfer labeled "Service Agreement Profits."

<sup>4</sup>The 4.9% in value obtained by Zurich Insurance Company is shown. No consideration was paid for this asset or thing of value. Zurich contends that the consideration consisted of a fixed rate of return of 7.5% from June 13, 1998 to June 13, 2003, thereby avoiding interest rate fluctuations. Plaintiff contends that a fixed rate of return was appropriate, but that the fixed rate of return should have been at least 12.0%, which is the fixed rate of return paid to Zurich's affiliate-investor/holder on Home senior secured debt between May 13, 1995 and June 12, 2003. This senior secured debt, which paid a 12.0% rate of return, reflects the market rate of return for a person supplying funds to Home. Zurich should have been paying this market rate of return on seniority-adjusted capital.

<sup>5</sup>Zurich provided a \$30,000,000 working capital line of credit but this line of credit was fully re-paid upon sale of the asset to a third party.

<sup>6</sup>Orange Stone Reinsurance, previously known as Centre Re Dutch, a successor to Centre Re International.

<sup>7</sup>The benefits of these transfers continue to accrue.

<sup>8</sup>Zurich has not provided information sufficient to perform this calculation for dates after June 30, 2002.

**RACKEMANN  
SAWYER & BREWSTER**  
PROFESSIONAL CORPORATION  
COUNSELLORS AT LAW

Established 1886  
Eric A. Smith  
617-951-1127  
esmith@rackemann.com

October 21, 2009

**BY EMAIL**

Dawn S. Pittman, Esq.  
Brady R. Dewar, Esq.  
Morgan, Lewis & Bockius LLP  
One Market Spear Street Tower  
San Francisco, California 94105

Re: Fuller-Austin, et al. v. Zurich Ins., et al.: Requests for Home Documents

Dear Dawn and Brady:

I write on behalf of Roger A. Seigny, New Hampshire Insurance Commissioner, in his capacity as Liquidator (“Liquidator”) of The Home Insurance Company (“Home”) to respond to your letter of September 23, 2009 and our discussions on October 5 and 18, 2009. Since the Liquidator’s position has been previously set forth in my letters of September 11 and October 1, 2009, I will turn immediately to the categories of documents. As we have discussed, however, the Liquidator’s agreement to produce documents depends upon the overall burden of the production, so all elements of the proposal in my September 11 letter and this letter are interdependent and the September 11 letter represents the Liquidator’s position except as modified below.<sup>1</sup> I also note that the California court has postponed the trial scheduled for December 1, 2009 and that the issues to be tried are to be the subject of discussion at a conference in November 2009. Turning to the categories of documents requested:

Category 1 seeks documents regarding the 1995 Employee Transition Agreement (“ETA”). As we discussed, to the extent that such documents were found and dated within the reasonable period of 1994 and 1996, they would have been produced in response to Prior Requests 2 and 15. You asked the Liquidator to conduct an additional search for documents dating after 1996. However, the ETA was only operative, and Home employees were “leased,” for the period between the June 1995 and January 1, 1996. As set forth in the Home Holdings 1996 10-K, all Home employees became employees of Risk Enterprise Management (“REM”) effective January 1, 1996. The Liquidator’s search already encompassed documents for the year

<sup>1</sup> Your September 23, 2009 letter correctly notes that the Liquidator will provide a privilege log for any documents withheld from production except for category 19.

(1996) after the ETA was operative, so there is not likely to be more. However, the Liquidator will conduct a search for documents dated after 1996.

Categories 2 and 24 seek documents concerning the Services Agreement. Such documents through February 2003, subject to exclusion of documents that would be unreasonably burdensome to locate, would have been produced in response to Prior Request 13. The production also included any existing summaries of payments after February 2003. You have asked for any summaries of payments to REM under the Services Agreement since the last production. However, there have been no payments to REM since the last production in 2007, and there are no additional summaries of payments to produce.

Category 3 seeks accounting and financial statements, and it was covered by Prior Requests 5 and 6. In particular, Home's quarterly and annual financial statements from 1985 to 2002 were previously produced. You asked about subsequent periods. Home was placed in rehabilitation and then liquidation in 2003, and no quarterly or annual financial statements on NAIC forms have been prepared since that time. The Liquidator provides financial reports to the supervising court in connection with the Liquidator's reports. Those reports are publicly available on the liquidation website, [www.hicilclerk.org](http://www.hicilclerk.org).

Categories 21, 22 and 23 concern the 1991 Stop Loss Treaty. Responsive documents, subject to limitations to avoid undue burden in searching, would have been produced in response to Prior Request 11. The plaintiffs ask for documents after February 2003. However, the Stop Loss Treaty was completely commuted by the end of 2000 (as to Zurich in the 1995 transaction and as to the other reinsurers during the period 1996-2000). Documents concerning the commutations would have been produced in the prior production, and there would not be documents after February 2003.

Categories 4, 14, and 16. These requests seek documents concerning Home policyholder renewal rates and statistics. The Liquidator will produce internal reports of underwriting results that in some instances contain such information. As we agreed, this will include any such reports prepared by Home or by REM (which acted for Home, as Home had no employees after 1995).

Categories 5, 6, and 25. These requests seek documents reflecting Home's "accounting treatment" of the Recapitalization Agreements or transactions, including documents supporting Home's Schedule P. The Liquidator produced Home Holdings' 10-Ks and Home's quarterly and annual statements, which where applicable contain notes regarding the 1991 Stop Loss Agreement and the 1995 Aggregate Excess of Loss Agreement and Portfolio Value Swap Agreements, in response to Prior Request 6. The Liquidator will search for workpapers to the notes regarding these agreements and workpapers for Schedule P for those filings. You asked



that the Liquidator produce the workpapers of outside accountants. The records of outside accountants are not in the Liquidator's possession, custody or control. As noted above, the Liquidator has not prepared financial statements in the NAIC form.

Category 7. This request seeks documents concerning the "historical rate of return" earned on Home's investment portfolio from 1985. During our call you clarified that plaintiffs sought pre-1995 information, and I noted that the investment reports and annual statements or 10-Ks previously produced contained information on yields but not historical rates of return. Except for one month's report, the Liquidator is not aware of any records providing the requested information. The Liquidator will, however, conduct a search for responsive documents for the 1985-1995 period.

Categories 8 and 10. These requests seek documents regarding the ownership of Sterling Forest and Home's accounting for Sterling Forest. As we discussed, this is a complex area, but Sterling Forest was routinely addressed in annual statements as well as the disclosure statement and bankruptcy plan. In particular, the equity interest in Sterling Forest was reflected in Schedule D, Part 2, Section 2 of the Home annual statements and quarterly financial reports produced in response to Prior Requests 3 and 6. The Liquidator will search for workpapers to the financial statements on this point. This is intended to cover both requests, as workpapers may address ownership and the burden of reviewing legal files (which such documents might be found) is significant, not least because of the privilege issues it would raise. You agreed to accept this on a without prejudice basis, and that is acceptable to the Liquidator provided the Liquidator also reserves all rights to oppose any further production.

Categories 9 and 11. These requests seek documents regarding the ownership of Gruntal and Home's accounting for Gruntal. The discussion of Categories 8 and 10 above also applies to these categories. As we discussed, the Liquidator has located certain Gruntal & Co. filings with the Securities and Exchange Commissioner (form X-17A-5) and audited financial statements for Gruntal Financial and will also produce such filings as are available on the ownership issue.

Categories 12 and 13. These requests seek all actuarial reports, appendices and workpapers from 1990. This request appears to seek the entire work product of the actuarial department and not to be relevant. My notes of our discussions do not indicate that you have narrowed the request in any way, and the Liquidator objects to it as unduly burdensome.

Category 15. During our call, you re-focused the request to ask for summary documents that tracked Zurich renewals, cut-throughs or insured-specific reinsurance. Given that this pertains to the recapitalization, any such summary documents would have been encompassed by the earlier production in response to Prior Request 2.

Category 17. This request seeks any and all communications between Home and Risk Enterprise Management from 1994 to the present. REM acted as manager for Home under the Services Agreement that was the subject of Prior Request 13. During our calls you did not narrow the request. It is not reasonably directed to relevant information, and the Liquidator objects to it as unduly burdensome.

Category 18. This request seeks any and all agreements between Home and Risk Enterprise Management from 1994 to the present. The Liquidator has already produced documents concerning the Services Agreement and any amendments thereto in response to Prior Request 13. The Liquidator will search for any other contracts between Home and REM prior to February 2003. Contracts between the Liquidator and REM are not relevant, but the Liquidator notes that the Transition Services Agreement and Asset Transfer Agreement with REM were the subject of motions for approval and court orders during the summer of 2003 that are available on the liquidation website, [www.hicilclerk.org](http://www.hicilclerk.org).

Category 19. This request seeks all correspondence, including reports, authored by or directed to David Nichols. Mr. Nichols was the New Hampshire Insurance Department's Representative under the 1995 Consent Order and the 1997 Order of Supervision, as supplemented. Materials submitted to him or prepared by him are protected from production by New Hampshire statutes, including RSA 400-A:37 and 401-B:7. The statutory language is clear, see in particular RSA 400-A:37, IV-a, and the Liquidator objects to the request.

Category 20. This request for all orders issued by the New Hampshire Insurance Department relating to Home is vague and overly broad. There do not appear to be many orders, however, and the Liquidator will conduct a search for them.

Category 26. This request for communications between Home and any broker or agent relating to the Recapitalization transactions. The Liquidator has previously produced, subject to limitations to avoid undue burden, documents concerning communications from Home to its policyholders regarding the recapitalization in response to Prior Request 10. You narrowed this request to seek form communications. Any such communications, other than those in broker or insured specific files, would have been produced in response to Prior Request 10. Since the business was transferred during 1995, there is no reason to search for such communications after the 1995-1998 period covered by that request.

Categories 27 and 28. The Amended Disclosure Statement for the 1998 Home Holdings bankruptcy enclosed with Elham Marder's letter of October 8, 2009 clarify that these requests concern 12% notes issued by Home Holdings in 1995. The request for the note instruments was already encompassed by Prior Request 2 and any responsive documents would already have been

produced as part of the transaction binders. (We have checked the earlier production, and a form of senior subordinated note may be found at 43806-43829.) As shown in the Amended Disclosure Statement, the notes were issued at a discount and no interest was required until maturity in 2004. In the event, the notes were resolved in the 1998 Home's Holding bankruptcy proceeding, as shown in the Amended Disclosure Statement, so there is no basis for searching for documents concerning payment, which would be unduly burdensome. The Liquidator will produce the Home Holdings Bankruptcy Plan as available.

Category 29. The 1993 Home Holdings Annual Statement provided with Mr. Marder's letter shows that the 14.875% notes and debentures that are the subject of this request were redeemed on January 27 and 28, 1994, more than a year before the 1995 recapitalization transaction. The request for documents regarding issuance of the notes and debentures in the late 1980s is thus not reasonably directed to relevant information and is unduly burdensome.

Category 30. The Amended Disclosure Statement provided with Mr. Marder's letter shows that the new common stock issued in lieu of the 7% Series A and B working capital notes was issued as part of the Home Holdings bankruptcy proceeding in 1998. The request for documents related to issuance of the new common stock is not reasonably directed to relevant information and, as the bankruptcy was an extensive and complex matter, is unduly burdensome as well. The Liquidator will produce the Home Holdings Bankruptcy Plan as available.

Category 33. This request for bills of sale, lease or other agreements between Home and Zurich for Home property is extremely burdensome. As we discussed, Home had a main office and nineteen field offices in 1994. Searching real estate records for a significant time period for each office is unwarranted, and the Liquidator objects as unduly burdensome.

The proposal set forth in this letter will represent a substantial effort in light of the Liquidator's limited resources. Please let me know whether we can amicably resolve the issue raised by the requests for documents on this basis. The Liquidator continues to reserve all rights with respect to the subpoena and the requests generally.

Very truly yours,



Eric A. Smith

Morgan, Lewis & Bockius LLP  
One Market, Spear Street Tower  
San Francisco, CA 94105-1126  
Tel. 415.442.1000  
Fax: 415.442.1001  
www.morganlewis.com

**Morgan Lewis**  
COUNSELORS AT LAW

**Brady R. Dewar**  
Associate  
415-442-1336  
bdewar@MorganLewis.com

October 23, 2009

VIA E-MAIL

Eric A. Smith  
Rackemann Sawyer & Brewster  
160 Federal Street  
Boston, MA 02110  
esmith@rackemann.com

**Re: Plaintiffs' Subpoena on the Home in Liquidation in *Fuller-Austin Asbestos Settlement Trust, et al. v. Zurich Insurance Company, et al.***

Dear Mr. Smith:

We write in response to your letter of October 21, 2009. In almost all respects, your letter reflects our understanding based on previous correspondence and our discussions of October 5 and 18 of the Liquidator's position with regard to the production of documents by the Home in Liquidation pursuant to the above-referenced subpoena.

Categories 2 and 24 of the documents requested seek documents concerning the Services Agreement. Our understanding based on our discussions is that all responsive documents in Home's possession would have been produced in response to Request 13 of the June 2006 Stipulation Regarding California Subpoenas and Liquidator's Motion for a Productive Order. However, your October 21 letter contains the qualification that such documents that exist "subject to the exclusion of documents that would be unreasonably burdensome to locate" would have been produced in response to prior Request 13. Our concern, of course, is that all documents in Home's possession that are responsive to Categories 2 and 24 are produced. Please provide clarification on the meaning of the qualification, and whether Home has in its possession responsive documents that have not been produced; this will allow us to resolve Categories 2 and 24 of the current request.

We understand that the Liquidator has refused to perform searches and/or make further production pursuant to Categories 8, 9, 12, 13, 17, 19, 29, 30, and 33. We are still evaluating

Eric A. Smith  
October 23, 2009  
Page 2

**Morgan Lewis**  
COUNSELORS AT LAW

whether there is a need to revisit these requests. Of course, if Plaintiffs ultimately do need to seek documents sought by those requests, we will work with you to attempt to minimize any burden and attempt agreement before seeking the assistance of the court.

In the meantime, we would like to focus on the areas of agreement, and we thank you for the efforts you and the Liquidator have made in this regard. Please inform us, by Monday, November 2 if possible, of the status of the Liquidator's searches and when the Liquidator will produce any responsive documents that are located.

Sincerely,

A handwritten signature in black ink, appearing to read "Brady R. Dewar", with a long horizontal flourish extending to the right.

Brady R. Dewar

c: Dawn S. Pittman  
Elham Marder

Exh. 4

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <b>BENJAMIN P. SMITH (State Bar No. 197551)</b> <b>LILIT GARIBYAN (State Bar. 208801)</b> <b>MORGAN, LEWIS &amp; BOCKIUS LLP</b> <b>One Market, Spear Street Tower</b> <b>San Francisco, CA 94105</b> TELEPHONE NO: 415.442.1000 FAX NO. (Optional): 415.442.1001 E-MAIL ADDRESS (Optional): lgaribyan@morganlewis.com ATTORNEY FOR (Name): Plaintiffs	<b>FOR COURT USE ONLY</b>           CASE NUMBER: <b>CGC-04-431719</b>
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Francisco</b> STREET ADDRESS: 400 McAllister Street MAILING ADDRESS: CITY AND ZIP CODE San Francisco, CA 94102 BRANCH NAME Civic Center Courthouse	
PLAINTIFF/PETITIONER: FULLER-AUSTIN ASBESTOS SETTLEMENT TRUST, et al. DEFENDANT/RESPONDENT: ZURICH-AMERICAN INSURANCE COMPANY, et al.	
<b>DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS</b>	

**THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):**  
 Risk Enterprise Management, Ltd., c/o CT Corporation System, 818 W. Seventh Street, Los Angeles, CA 90017

**1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:**

To (name of deposition officer): Specialized Legal Services (Attn: Tracy Nedderman 415.357.0500)  
 On (date): June 28, 2007 At (time): 10:00 a.m.  
 Location (address): 1112 Bryant Street, Suite 200, San Francisco, CA 94103

**Do not release the requested records to the deposition officer prior to the date and time stated above.**

- a.  by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
  - b.  by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
  - c.  by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows: See Attachment 3.

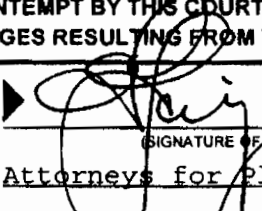
Continued on Attachment 3.

**4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.**

**DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.**

Date issued: June 8, 2007

Lilit Garibyan  
 (TYPE OR PRINT NAME)

  
 (SIGNATURE OF PERSON ISSUING SUBPOENA)  
 Attorneys for Plaintiffs  
 (TITLE)

(Proof of service on reverse)

ATTACHMENT 3 TO SUBPOENA TO  
RISK ENTERPRISE MANAGEMENT LIMITED

**I.**  
**DEFINITIONS**

1. The term "DOCUMENT(S)" shall mean and refer to the original (as defined in California Evidence Code §255) and, where the original is not within YOUR control or custody, the duplicate (as defined in California Evidence Code §260) of any writing (as defined in the California Evidence Code §250), including all drafts and copies bearing notations, marks, or matters not found on the original and/or duplicate. The term "DOCUMENT" shall also include any information contained on microfilm or in computers, computer disks, tapes, or otherwise stored electronically (translated if necessary through detection or decoding devices into useable form). All designated DOCUMENTS are to include all attachments and enclosures.
2. The phrase "ALL DOCUMENTS" means every DOCUMENT known to RISK ENTERPRISE MANAGEMENT ("REM") (as defined below) and every DOCUMENT that can be located or discovered by reasonably diligent efforts on REM'S part.
3. The terms "REM," "YOU," "YOUR," and "YOURS" shall mean and refer to Risk Enterprise Management Limited.
4. The phrase "HOME" shall mean and refer to Home Holdings Inc., The Home Insurance Company, The Home Insurance Company of Illinois, The Home Insurance Company of Wisconsin, City Insurance Company, The Home Indemnity Company, The Home Insurance Company of Indiana, Home Lloyd's Insurance Company of Texas, U.S. International Reinsurance Company, and any parent, subsidiary, predecessor, successor, and/or assignee of each entity, ~~including the Home Insurance Company in Liquidation.~~

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5. The term "SERVICES AGREEMENTS" shall collectively mean and refer to the Services Agreement dated December 24, 1994 between and among Zurich Insurance Co., US Branch, Zurich American Insurance Co. of Illinois, Steadfast Insurance Co., REM, Home Holdings Inc., and The Home Insurance Co., and any amendments; and the Services Agreement dated June 12, 1995 between and among REM, Zurich Centre Investments Ltd, Home Holdings Inc., The Home Insurance Co., U. S. International Reinsurance Co., The Home Insurance Co. of Illinois, the Home Insurance Co. of Wisconsin, and any amendments.

6. The phrase "ZURICH-AFFILIATED ENTITY(IES)" shall mean and refer to YOU and any entity related to Zurich Insurance Company by shareholdings or other means of control, including but not limited to a subsidiary, parent or affiliated corporation.
7. The phrase "HOME TRANSACTION" shall mean and refer to all matters related to the 1995 transaction described in the proceeding entitled "In the Matter of Acquisition of The Home Insurance Company, the Home Indemnity Company, and U.S. International Reinsurance Company by ZCI Investments Limited and Zurich Insurance Company" before the Department of Insurance for the State of New Hampshire.
8. The term "PERMITTED PRACTICES" shall mean deviations from Statutory Accounting Principles.

## **II. INSTRUCTIONS**

1. The Documents shall be produced as they are kept in the usual course of business or shall be organized and labeled to correspond with the specific requests below to which they respond. If a Document is responsive to more than one request it shall be labeled to correspond to the first such request.
2. If you withhold any Document from production based on the ground of privilege, work product or otherwise, identify for each and every such Document (1) the basis for withholding production of the Document, e.g., attorney-client privilege or work product; (2) if the basis is attorney-client privilege, identify the client and the attorney(s); (3) if the basis for withholding production of a Document is work product or trial preparation materials, identify the litigation in anticipation of or for which the Document was prepared; (4) the title and subject matter of the Document; (5) the type of Document (e.g., letter, memorandum); (6) the composition of the Document (e.g., typed, handwritten or tape); (7) whether the Document is an original or a copy; (8) the number of pages of the Document; (9) the date of the Document; (10) the author(s) of the Document, including, without limitation, the person who drafted or otherwise prepared the Document, the individual who signed the Document, and the Person on whose behalf the Document was prepared or signed; and (11) the recipient(s) of the Document, including, without limitation, any individual and other Person to whom the Document was sent, shown or who otherwise was aware of the contents of the Document.
3. If a Document called for by these requests has been destroyed, identify such Document at the time of production and additionally provide the following: the date of destruction, manner of destruction, name, title, and address of the individual who destroyed the Document, and a full description of the efforts made to locate the Document and copies thereof.



4. In responding to this Subpoena YOU are to furnish all DOCUMENTS within YOUR possession, in YOUR custody, or under YOUR control, or within the possession, custody or control of any of YOUR parent companies, partners, agents, accountants, attorneys, employees, representatives and other persons or entities acting or with the actual or apparent authority to act on behalf of YOU.
5. These requests shall be deemed to seek production of all DOCUMENTS available to YOU, regardless of whether such DOCUMENTS presently exist or ever existed in printed form. Accordingly, these requests expressly include, without limitation, e-mails, computer discs, hard copies of information stored on computer discs or in computer memory, and all DOCUMENTS that can be generated using software and information presently stored or regularly used in any computer or computer system, including information accessible to YOU through shared information services accessed by modem or other electronic means.

### **III. DOCUMENTS REQUESTED**

1. ALL DOCUMENTS [other than claim files] RELATING TO the handling of HOME's run-off and /or the operations and management of HOME from 1995 to the present.
2. DOCUMENTS sufficient to identify the number and/or location of former HOME employees REM has hired from 1994 to the present.
3. ALL DOCUMENTS reflecting or describing how, by whom and/or in what amounts REM was compensated for services it performed under the SERVICES AGREEMENTS, from 1994 to the present.
4. ALL DOCUMENTS reflecting or describing any forecasts, projections or analysis conducted by any ZURICH-AFFILIATED ENTITY including YOU or HOME or their employees, agents, consultants and actuaries, regarding REM's expected profits and losses arising from the SERVICES AGREEMENTS.

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5. ALL DOCUMENTS reflecting or describing the amount of revenues, expenses, profits and/or losses REM earned or incurred as a result of the SERVICES AGREEMENTS, from 1994 to the present.
6. ALL DOCUMENTS reflecting or describing REM's annual and quarterly revenues, expenses, and profits generated as a result of services it provided to HOME from 1994 to the present.

7. ALL DOCUMENTS reflecting or describing the amounts HOME has paid REM for handling claims under HOME policies, or for other services performed, in each year from 1994 to the present.
8. ALL DOCUMENTS reflecting or describing the number or value of environmental liability and asbestos-related claims HOME's policyholders submitted in each year from 1990 to the present to HOME and/or REM for coverage, including documents reflecting how many of these claims have been approved, denied, are pending or have been resolved.
9. All DOCUMENTS reflecting or describing any policies, procedures, guidelines or instructions provided to YOUR claims personnel regarding the handling of claims against HOME's policyholders from 1994 to the present, including, but not limited to the handling of environmental and/or asbestos-related liability claims.
10. ALL DOCUMENTS reflecting or describing any bulk reserves established by HOME and/or REM for environmental and/or or asbestos-related liabilities from 1994 to the present.
11. ALL DOCUMENTS reflecting or describing REM's claims adjusting policies from 1994 to the present for claims against HOME's policyholders (including environmental and asbestos-related liability claims), including but not limited to any claims adjusting guidance manuals, policy manuals, or training manuals.
12. ALL DOCUMENTS reflecting or describing HOME's payment of liabilities for reported claims, and Incurred But Not Reported ("IBNR") claims, which REM administered or managed including, but not limited to any calculations made regarding the payment amount, the expected future claims or payments which were commuted, the gain on the commutation on Home's financial statements, and the compensation which was provided to REM or any other ZURICH-AFFILIATED ENTITY as a result of the commutation. ALL DOCUMENTS reflecting or describing any PERMITTED PRACTICES that any ZURICH-AFFILIATED ENTITY including YOU or HOME sought or obtained during the period HOME's claims were being handled by REM.

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13. ALL DOCUMENTS reflecting or describing any PERMITTED PRACTICES that any ZURICH-AFFILIATED ENTITY including YOU or HOME sought or obtained during the period HOME'S claims were being handled by REM.
14. ALL DOCUMENTS reflecting or describing the effect or potential effect any PERMITTED PRACTICES sought or obtained could have on the timing of HOME's liquidation.
15. ALL DOCUMENTS reflecting or describing any claims statistics for environmental liabilities and/or asbestos bodily injury and property damage claims, including but not limited to claims logs, reports from state regulators, and reports submitted to state regulators.

16. ALL DOCUMENTS reflecting or describing the amount REM and/or HOME has spent in each year from 1990 to the present to litigate coverage disputes for environmental and/or asbestos-related liability claims with HOME policyholders.
17. ALL DOCUMENTS reflecting or describing the amount REM and/or HOME has paid in each year from 1990 to the present for the defense of environmental and/or asbestos-related liability claims against HOME policyholders.
18. ALL DOCUMENTS reflecting the amount REM has paid in each year from 1990 to the present in indemnity for environmental and/or asbestos-related liability claims against HOME policyholders.
19. ALL DOCUMENTS reflecting or describing YOUR relationship with Zurich Insurance Company from 1994 to the present, including any financial or ownership relationship.
20. ALL DOCUMENTS that sufficiently describe YOUR relationship with any other ZURICH-AFFILIATED ENTITY, including YOUR relationship with Zurich American Insurance Company (formerly, Zurich Insurance Co., U.S. Branch) or any other member of the Zurich American Insurance Pool, from 1994 to the present.
21. ALL DOCUMENTS, including organizational charts, which describe YOUR corporate structure from 1994 to the present.
22. ALL DOCUMENTS describing the responsibilities or actions of any committee or group comprised to approve payment of claims from HOME policyholders from 1995 through 2003.
23. ALL DOCUMENTS sufficient to identify the members of any committee comprised to approve payment of claims from HOME policyholders from 1995 through 2003.
- ~~24. ALL DOCUMENTS reflecting or describing any projections, analyses, forecasts, or evaluations conducted regarding the likelihood that REM would recover an additional 15% fee for the handling of HOME claims, pursuant to the terms of either of the SERVICES AGREEMENTS.~~
25. ALL DOCUMENTS reflecting or describing when, how or under what circumstances REM would recover an additional 15% fee for the handling of HOME claims, pursuant to the terms of either of the SERVICES AGREEMENTS.

26. ALL claim files relating to: Fuller-Austin Asbestos Settlement Trust, Fuller-Austin Insulation Company, Kraft Foods Global, Inc., National Dairy Products Corporation, Kraftco Corporation, Kraft, Inc., General Foods Corporation, Nabisco Brands Co., Nicor, Inc., Northern Illinois Gas Company, PubliCard, Inc., Somerset Oil, Inc., Southland Oil Company, Ohio Edison Company, Pennsylvania Power Company, The Cleveland Electric Illuminating Company, Toledo Edison Company, ITT Corporation, Swan Transportation Company, Swan Asbestos & Silica Settlement Trust, Monongahela Power Company, West Penn Power Company, the Potomac Edison Company, Rohm and Haas Company, and Deere & Company, Western Asbestos Settlement Trust, Western Mac Arthur Company, Mac Arthur Company, Western Asbestos Company, PepsiAmericas, Inc., Southern Natural Gas Company, El Paso Production Company, Petro-Tex Chemical Corporation Dissolution, Distribution, Liquidating, And Recovery Trust, and/or Tennessee Gas Pipeline Company.
27. ALL DOCUMENTS reflecting communication or correspondence, including but not limited to communication or correspondence between REM and any other ZURICH-AFFILIATED ENTITY, regarding claims submitted by PLAINTIFFS, including, but not limited to the handling, payment, non-payment, or resolution of those claims..
28. ALL DOCUMENTS reflecting or describing any inventory of potential exposure for asbestos or environmental liabilities by HOME or REM's Environmental and Mass Tort Division which HOME has utilized to evaluate its industry benchmarks to establish reserves from 1990 to the present.
29. ALL DOCUMENTS reflecting or describing any projections REM prepared regarding its projected annual expenses, as required by the SERVICES AGREEMENTS.
30. ALL DOCUMENTS reflecting or describing the review of HOME'S loss reserves by a consulting actuarial firm under the direction of the New Hampshire Department of Insurance, including any reports or other work produce generated by the actuarial firm.

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31. ALL DOCUMENTS reflecting or describing the economic, actuarial and accounting review required by the New Hampshire Department of Insurance's March 3, 1997 Order of Supervision.
32. All reports YOU or HOME filed pursuant to California Insurance Code section 900 and similar statutes in other states.
33. All reports the California Insurance Commissioner prepared pursuant to California Insurance Code section 985.5, or an Insurance Commissioner of other state(s) prepared pursuant to a similar statute, regarding the causes and factors of

HOME'S insolvency.

34. ALL DOCUMENTS reflecting or describing any changes to or termination of the SERVICES AGREEMENTS.
35. DOCUMENTS sufficiently reflecting the number of total REM employees in 1995.
36. ALL DOCUMENTS sufficiently reflecting the location of REM offices from 1995 to 2003, including whether these offices were formerly HOME offices.
37. ALL DOCUMENTS reflecting or describing how REM valued the HOME employees, facilities, technology, and other furnishings for the purposes of assessing costs charged to HOME under the SERVICES AGREEMENTS.
38. All audited and unaudited monthly, quarterly and annual financial statements, including notes, for REM and HOME from 1995 to the present.
39. Balance sheets of HOME for the period immediately before and after June 12, 1995.
40. Schedule listing any and all of REM's officers and directors from the period dating January 1995 to the present, including the name of the officer or director, his or her title, and whether the officer and directors holds any other position with any other ZURICH- AFFILIATED ENTITIES.
41. Board of Directors Minutes for REM from 1995 to the present.
42. Organizational chart of HOME, showing both parent and all subsidiaries and percentage owned by each entity as of January 1, 1995 to the present.
43. ALL DOCUMENTS reflecting or describing communications to or from Zurich Insurance Co., or any other ZURICH-AFFILIATED ENTITY, including HOME or REM, involving the HOME TRANSACTION or the New Hampshire Department of Insurance form December 1994 through the present that are not part of the public record of the New Hampshire Insurance proceedings.
44. All directives, bulletins or memoranda by YOU or any other ZURICH-AFFILIATED ENTITY regarding the management of operations of HOME.
45. Articles of Incorporation for REM.
46. ALL DOCUMENTS reflecting or describing the amount or percentage of YOUR total revenue received from HOME in each year from 1995 to the present.

47. ALL DOCUMENTS reflecting or describing Zurich Centre Investments Ltd.'s performance of its obligations under either of the SERVICES AGREEMENTS whereby it agreed to ensure that REM will have sufficient resources to adequately perform its obligations under the SERVICES AGREEMENTS.

**FULLER-AUSTIN DOCUMENT SUBPOENA**

**PRIVILEGE LOG**

“Oversight” refers to the statutory confidentiality provided by RSA 400-A:37 and RSA 401-B:7 during this period of the New Hampshire Insurance Department’s oversight of The Home Insurance Company (“The Home”) pursuant to the June 9, 1995 Consent Order; “Supervision” refers to the statutory confidentiality provided by RSA 400-A:37, RSA 401-B:7, and RSA 400-F:8 during the period of the New Hampshire Insurance Department’s supervision of The Home pursuant to the March 3, 1997 Order of Supervision

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
1	11/04/1996	Steven D. Germain	Roger Moak		Fax re letter re Security Holders Agreement	AC/WP
2	9/30/1996	Jim Duhig	Roger Moak		Memo re significant and material transactions and attachment	AC/WP
3	1/25/1999	Jean C. Sena	Peter Johnson, Charles Callahan, Joseph Campbell, Roger Moak, Gary Napolitano, Michael Riney, Jonathan Rosen, Jonathan Terrell		Email re Zurich announcement memo and attachment	AC/WP
4	1/25/1999	Bert Morton	Peter Johnson, Charles Callahan, Timothy Callahan, Roger Moak		Email re Zurich announcement memo and attachment	AC/WP
5	12/17/1999	Michael Riney	Peter Johnson, Charles Callahan, Timothy Callahan, Roger Moak, Barry Belknap, Patricia Bowell, Tom Kober, Matthew Craig, Kevin Kelly		Email re relationship with Arthur Andersen	AC/WP
6	1/27/1999	Michael Riney	Chuck Callahan	Rudy Dimmling, Roger Moak, Karl Moller, Art Wilson	Email re relationship with Arthur Andersen	AC/WP
7	4/23/2003				Prior Approval Request	Supervision/Oversight
8	6/16/2003	Michael Riney	Patricia Villafane	Attorneys on email string	Email re court orders pertaining to Home Insurance Co. and attachments	AC/WP
9	3/3/2003	Michael Riney	Patricia Villane	Attorneys on email string	Email re rehabilitation	AC/WP
10	6/12/2003	Roger Moak	Charles Callahan,	Martin Gross, Joel	Email re Home liquidation order	AC/WP

E.T. 5

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
11	6/9/2003	Tom Kober	Peter Johnson, Michael Riney	Ross, Tim McIntyre, Attorney from Sulloway & Hollis ("Sulloway")	Email re Home Insurance Co. pending liquidation	AC/W/P
12	6/9/2004	Joel Ross	Distribution Timothy Callahan, Tim McIntyre, Michael Riney	Distribution	Email re conversation with Tom Kober	AC/W/P
13	9/25/2003	Al Lawrence	Paula Maguire	Michael Brambier, Michael Riney, Timothy Callahan, Roger Moak, Maria Rosqvist Croce	Email re September fund raising request and attachment	AC/W/P
14	3/3/2003	Michael Riney	Patricia Villafane	Attorneys on email string below	Email re Home liquidation documents and attachments	AC/W/P
15	3/11/2003	Joel Ross	Timothy Callahan, Joseph Campbell, George Mitchell, Karl Moller, Gary Napolitano, Michael Riney, Jonathan Rosen, Arthur Wilson	Tom Kober, Roger Moak, Tim McIntyre	Email re Prior Approval Form and attachment	AC/W/P
16	4/10/2003	Michael Riney	Patricia Villafane	Attorneys on email string below	Email re Home Insurance Co. rehabilitation and attachments	AC/W/P
17	3/17/2003	Michael Riney	Patricia Villafane		Email re REM reimbursements and attachment	AC/W/P
18	3/6/2003	Michael Riney	Peter Johnson, Charles Callahan, Roger Moak, Tom Kober, Paula Maguire, Matthew Craig, Michael Brambier, Randy Seiner		Email re REM Press release	AC/W/P
19	3/5/2003	Peter Johnson	Doris Larmann	Monica Maechler, Florian Meyer, Charles Callahan, Michael Riney, Roger Moak	Email re REM press release pertaining to Home Insurance Co.	AC/W/P
20	3/5/2003	Michael Riney	Peter Johnson, Charles Callahan, Roger Moak, Timothy Callahan		Email re revisions to press release and attachment	AC/W/P



No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
21	3/4/2003	Michael Riney	Peter Johnson, Charles Callahan, Roger Moak		Email re press release and attachment	AC/WP
22	1/29/1999	Roger Moak	Anders Barsk, Zaid Pedersen	Iris Engels	Memo re REM's Principal: The Home Insurance Company	AC/WP
23	2/14/2003	Tom Kober	Roger Moak	Michael Riney	Email re Home's Workers' Compensation	AC/WP
24	5/9/2003	Michael Riney	Patricia Villafance	Attorney on email string below	Email re Home Insurance Co. communication material and attachments	AC/WP
25	5/8/2003	Peter Johnson	Charles Callahan, Roger Moak, Michael Riney, Tom Kober, Timothy Callahan		Email re Home Insurance Co. communication material	AC/WP
26	5/27/2003	Michael Riney	Patricia Villafance	Attorney on email string below	Email re draft notices pertaining to Home liquidation	AC/WP
27	5/14/2003	Peter Johnson	Michael Riney	Roger Moak, Charles Callahan	Email re teleconference notes	AC/WP
28	3/5/2003	Michael Riney	Charles Callahan, Peter Johnson, Roger Moak		Email re REM press release and attachments	AC/WP
29	Undated				Memo re preliminary legal issues	AC/WP
30	1/13/1999	Roger Moak	Alden Warner	Iris Engels	Memo re [non-Zurich policy holder]	AC/WP
31	Undated				Memo re pending coverage litigation by risk state as of 4/30/2003	AC/WP
32	6/2/2003	Michael Riney	pabinsconsult@aol.com	Michael Averill, Tom Kober	Email re claims staffing discussion	Supervision/Oversight
33	Undated				List of talking points	AC/WP
34	4/10/2003	Marry Anne Narkawicz	Roger Moak		Fax re Letter from State of Mississippi	AC/WP
35	4/10/2003	Timothy Callahan	Martin Gross	Roger Moak	Fax re Incentive Compensation	AC/WP
36	4/3/2003	Martin Honigsberg	Roger Moak	Martin Gross	Email re Incentive payments with hand written notes	AC/WP
37	4/2/2003	Martin Honigsberg	Joel Ross, Martin Gross, Roger Moak		email re Home	AC/WP
38	3/11/2003	Steve Germain	Roger Moak	John Cross	Email re Note Payoff	AC/WP
39	3/7/2003	Martin Honigsberg	Roger Moak		Fax re Rehabilitation of Home Insurance Company	AC/WP
40	3/5/2003	Suzanne Gorman	Roger Moak		Fax re Order of Notice and Verified Petition for Rehabilitation and Proposed Order Appointing Rehabilitator	AC/WP
41	4/30/2003	Frank Parker	Liya Zhou, Al Lawrence, Maria Croce	Kiki Ljunghe-Burke, Richard Wygand	Email re Corrections to Jonathan Rosen's Home Ins hours are complete	AC/WP
42	2/13/2000	Al Lawrence	Timothy Callahan,	Maria Croce	Email re Averill Requests	AC/WP/Superv

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
	[sic]		Charles Callahan, Roger Moak			ision/Oversight
43	11/11/2002	Al Lawrence	Michael Averill	Timothy Callahan, Roger Moak, Maria Croce	Email re Time Allocations – Sept. 2002	AC/WP/Supervision/Oversight
44	10/25/2002	Al Lawrence	Michael Averill	Timothy Callahan, Roger Moak, Maria Croce	Email re Time Allocations	AC/WP/Supervision/Oversight
45	7/22/2002	Al Lawrence	Michael Averill	Timothy Callahan, Roger Moak, Arthur Wilson	Email re May G&A Expense Variances	AC/WP/Supervision/Oversight
46	12/3/2001	Roger Moak	Maria Croce		Email re Home Budget 2002	AC/WP
47	1/22/2001	Bruce Lerner	Tim McIntyre		Email re Brea, CA – Good News	AC/WP
48	10/26/2001	Roger Moak	Michael Averill	Al Lawrence, Ray Tatti	Email re Response to Expense Review Draft Report	AC/WP/Supervision/Oversight
49	11/9/2001	Al Lawrence	Ray Tatti	Timothy Callahan, Roger Moak	Email re Expense Allocation Review	AC/WP/Supervision/Oversight
50	11/16/2001	Al Lawrence	Timothy Callahan, Roger Moak		Email re Expense Allocation Review	AC/WP/Supervision/Oversight
51	12/3/2001	Roger Moak	Michael Averill	Dave Nichols	Email re Home Budget 2002	AC/WP/Supervision/Oversight
52	1/21/2002	Roger Moak	Charles Callahan, Peter Johnson	Al Lawrence, Arthur Wilson	Email re Averill Requests	AC/WP/Supervision/Oversight
53	1/28/2008	Roger Moak	Michael Averill, Ray Tatti	Al Lawrence, Arthur Wilson, Timothy Callahan	Email re Budget Inquiries	AC/WP/Supervision/Oversight
54	3/13/2002	Al Lawrence	Michael Averill	Roger Moak, Timothy Callahan	Email re Zurich Management Fee	AC/WP/Supervision/Oversight
55	3/13/2002	Al Lawrence	Roger Moak	Timothy Callahan	Email re Expense Allocations – Averill Request	AC/WP/Supervision/Oversight
56	2/27/2002	Al Lawrence	Nellie Gomez	Roger Moak	Email re NHID	AC/WP/Supervision/Oversight
57	3/25/2002	Ray Tatti	Michael Averill	Al Lawrence, Roger Moak	Email re Expense allocation recommendations	AC/WP/Supervision/Oversight
58	4/26/2002	Michael Averill	Al Lawrence	Roger Moak	Email re 2001 Expenses	AC/WP/Supervision/Oversight
59	4/26/2002	Al Lawrence	Michael Averill	Roger Moak	Email re 2001 Expenses	AC/WP/Supervision/Oversight
60	4/26/2002	Al Lawrence	Michael Averill	Roger Moak	Email re 2001 Expenses	AC/WP/Supervision/Oversight
61	9/9/2002	Al Lawrence	Michael Averill	Timothy Callahan, Roger Moak	Email re Requests Visit of August 28 <sup>th</sup>	AC/WP/Supervision/Oversight

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
62	8/6/2001	Al Lawrence	James Sweeney	Timothy Callahan, Roger Moak, Bert Morton, Maria Croce	Email re Expense Allocation Review – Severance Questions	AC/WP/Supervision/Oversight
63	7/2/2001	Al Lawrence	James Sweeney	Charles Callahan, Timothy Callahan, Roger Moak, Ray Tatti	Email re Expense Allocation Reviews (Tatti Memo of 6/28)	AC/WP/Supervision/Oversight
64	3/9/2001	Al Lawrence	James Sweeney, Ray Tatti	Roger Moak, Timothy Callahan	Email re Home Insurance Expenses	AC/WP/Supervision/Oversight
65	5/2/2003	Al Lawrence	Al Lawrence		Email re Prepaid D&O/E&O Prior Approval Request	AC/WP/Supervision/Oversight
66	3/20/2003	Al Lawrence	Michael Averill	Timothy Callahan, Roger Moak, Arthur Wilson	Email re G&A Expense Variance – January 2003	AC/WP/Supervision/Oversight
67	11/4/2002	Al Lawrence	Michael Averill	Charles Callahan, Timothy Callahan, Roger Moak	Email re G&A Expenses	AC/WP/Supervision/Oversight
68	9/9/2002	Al Lawrence	Michael Averill	Timothy Callahan, Roger Moak; bcc: Al Lawrence	Email re Requests – Visit of August 28 <sup>th</sup>	AC/WP/Supervision/Oversight
69	8/16/2002	Al Lawrence	Michael Averill	Timothy Callahan, Roger Moak, Maria Croce	Email re June Expense Package	AC/WP/Supervision/Oversight
70	2/11/2002	Al Lawrence	Michael Averill, Ray Tatti	Timothy Callahan, Roger Moak, Arthur Wilson; bcc: Maria Croce	Email re Home Insurance 2001 G&A Expenses	AC/WP/Supervision/Oversight
71	2/27/2002	Al Lawrence	Ray Tatti	Timothy Callahan, Roger Moak, Arthur Wilson	Email re Home G&A Expense Package – Dec. YTD 2001	AC/WP/Supervision/Oversight
72	2/15/2002	Al Lawrence	Ray Tatti	Roger Moak, Timothy Callahan	Email re Home G&A Expense Package	AC/WP/Supervision/Oversight
73	7/2/2001	Al Lawrence	James Sweeney	Charles Callahan, Timothy Callahan, Roger Moak, Ray Tatti	Email re Expense Allocation Reviews (Tatti Memo of 6/28)	AC/WP/Supervision/Oversight
74	4/10/2003	Joel Ross	Al Lawrence	Chris McLoughlin, Maria Croce, Roger Moak, Helene Steinberg, Arthur Wilson	Email re Home Insurance Accruals – Legal Fees	AC/WP
75	4/4/2003	Al Lawrence	Joel Ross	Chris McLoughlin, Maria Croce	Email re Home Insurance Accruals - Legal Fees	AC/WP

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
76	4/11/2003	Al Lawrence	Joel Ross, Arthur Wilson	Chris McLoughlin, Maria Croce	Email re Legal Fees Budget	AC/WP
77	3/31/2003	Al Lawrence	Jonathan Rosen	Efraim Abramssohn, Alice Chan, Timothy Callahan	Email re Budget Revisitation	AC/WP
78	3/10/2003	Al Lawrence	James Liell	Jonathan Rosen, Richard Wygand, Maria Croce, Richard Wygand	Email re Timekeeping for February	AC/WP
79	3/19/2003	Al Lawrence	Joseph Campbell, Gary Galante George Mitchell, Karl Moller, Roger Moak, Gary Napolitano, Jonathan Rosen, Terry Scrivani, Arthur Wilson	Charles Callahan, Timothy Callahan,, Maria Croce, Tom Capenter, John Proscio	Email re Budget Revisitation	AC/WP
80	3/5/2003	Al Lawrence	Roger Moak	Timothy Callahan	Email re Recruiting Expenses – Follow-up	AC/WP
81	2/11/2003	Al Lawrence	Roger Moak	Timothy Callahan	Email re Recruiting Expenses	AC/WP
82	12/24/2002	Al Lawrence	Joel Ross, Arthur Wilson	Timothy Callahan, maria Croce, Chris McLoughlin	Email re Legal Accrual	AC/WP
83	5/13/2003	Al Lawrence	Michael Averill	Timothy Callahan, Roger Moak	Email re D&O/E&O Prior Approval Request	AC/WP/Supervision/Oversight
84	7/2/2001	Charles Callahan	Al Lawrence	Roger Moak	Email re Proposed Response to Tatti	AC/WP/Supervision/Oversight
85	7/26/2001	Al Lawrence	Bert Morton	Timothy Callahan, Charles Callahan, Roger Moak	Email re Devito Review – Severanc	AC/WP/Supervision/Oversight
86	8/2/2001	Roger Moak	Tim McIntyre, Michael Foley	Joseph Campbell, Timothy Callahan, Al Lawrence	Email re Ray Tatti request	AC/WP/Supervision/Oversight
87	8/3/2001	Tim McIntyre	Roger Moak	Al Lawrence, Joseph Campbell, Michael Foley, Timothy Callahan	Email re Ray Tatti request – Privileged and Confidential	AC/WP/Supervision/Oversight
88	8/6/2001	Al Lawrence	Timothy Callahan, Roger Moak	Maria Croce	Email re Addendum: Expense allocation review – Admin Allocations	AC/WP
89	2/13/2003	Al Lawrence	Timothy Callahan, Charles Callahan, Roger Moak	Maria Croce	Email re Averill Requests	AC/WP/Supervision/Oversight
90	4/1/2003	Timothy Callahan	Peter Johnson, Charles Callahan,	Al Lawrence	Email re April Funding Request	AC/WP

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
91	4/29/2003	Al Lawrence	Roger Moak Joel Ross	Timothy Callahan, Roger Moak, Arthur Wilson	Email re Home G&A Expense Package	AC/WP
92	10/27/1999	Al Lawrence	Distribution	Distribution including Roger Moak and Jonathan Rosen	Email re 2000 Home Budget – Travel Adjustment	AC/WP
93	4/5/2000	Al Lawrence	Raimund Angeles, Alice Ling, Frank Parker, Theresa Rago, Richard Wygand	Timothy Callahan, Karl Moller, Jonathan Rosen, Maria Croce, Jack Schwartz, Helene Steinberg, Arthur Wilson	Email re Reinsurance Timekeeping	AC/WP
94	4/17/2001	Roger Moak	Al Lawrence	Karl Moller, Michael Riney, Tom Kober, Kevin Kelly, Jonathan Rosen, George Mitchell, Arthur Wilson, Jonathan Terrell, Gary Napolitano, Joseph Campbell, Bert Morton	Email re NHID Requests for Information	AC/WP/Supervision/Oversight
95	5/1/2001	Al Lawrence	Roger Moak	Timothy Callahan, Arthur Wilson	Email re ALAE Costs Incurred on Behalf of Home	AC/WP
96	10/25/1999	Ifigenia Alvanos	Distribution	Distribution including Roger Moak and Jonathan Rosen	Email re Travel and Training Reductions – Home Client	AC/WP
97	7/17/2001	Al Lawrence	Roger Moak	Timothy Callahan, Maria Croce	Email re DeVito Request – Outside Services Allocations	AC/WP/Supervision/Oversight
98	12/27/2002	Arthur Wilson	Al Lawrence	Chris McLoughlin, Joel Ross, Maria Croce, Timothy Callahan	Email re Legal Accrual	AC/WP
99	1/18/1999	Al Lawrence	Jonathan Rosen, Jonathan Terrell, Karen Bennett	Michael Brambier, Timothy Callahan, Maria Croce, Karl Moller, Patricia Martini, Roger Moak, Helene	Email re Timekeeping – ALAE Expense Transfers	AC/WP

No.	DOC DATE	FROM/AUTHOR	TO/RECIP	CC	DOC DESCRIPTION	PRIVILEGE
100	12/5/2002	Roger Moak	Al Lawrence	Steinberg, Arthur Wilson Charels Callahan, Timothy Callahan, Peter Johnson	Email re Home Budget Exhibits	AC/WP
101	8/16/2002	Roger Moak	Al Lawrence	Timothy Callahan	Email re Home Expense Package – June	AC/WP
102	11/1/2002	Al Lawrence	Stephen Eisenmann, Jonathan Rosen, George Mitchell, Karl Moller, Arthur Wilson, Gary Napolitano, Roger Moak	Timothy Callahan	Email re Home Related Headcount Targets	AC/WP
103	6/5/2002	Al Lawrence	Charles Callahan, Timothy Callahan, Peter Johnson, Roger Moak	Maria Croce	Email re Averill Visit	AC/WP/Supervision/Oversight
104	1/4/2002	Al Lawrence	Roger Moak	Timothy Callahan	Email re Averill Inquirey	AC/WP
105	2/8/2002	Roger Moak	Al Lawrence	Timothy Callahan	Email re Tatti Request – 2001 G&A Expenses	AC/WP/Supervision/Oversight
106	1/31/200	Al Lawrence	Roger Moak	Timothy Callahan	Email re Draft Response Zurich Management Fees	AC/WP/Supervision/Oversight
107	2/13/2002	Al Lawrence	Roger Moak	Timothy Callahan, Maria Croce	Email re Tatti Request – Home G&A Expense Package	AC/WP/Supervision/Oversight
108	2/11/2002	Timothy Callahan	Roger Moak	Al Lawrence	Email re Draft Response Zurich Management Fees	AC/WP/Supervision/Oversight
109	2/14/2002	Al Lawrence	Roger Moak	Timothy Callahan	Email re Draft Response Zurich Management Fees	AC/WP/Supervision/Oversight
110	2/14/2002	Al Lawrence	Roger Moak	Timothy Callahan	Email re Tatti Request	AC/WP/Supervision/Oversight
111	2/13/2002	Roger Moak	Al Lawrence	Timothy Callahan	Email re Tatti Request	AC/WP/Supervision/Oversight
112	4/10/2002	Roger Moak	Al Lawrence	Joel Ross, Timothy Callahan, Arthur Wilson	Email re Averill Request – General Counsel's Office	AC/WP/Supervision/Oversight
113	4/8/2002	Roger Moak	Al Lawrence	Timothy Callahan	Email re Averill Request – General Counsel's Office	AC/WP/Supervision/Oversight
114	4/8/2002	Bruce Lerner	Al Lawrence	Charles Callahan, Roger Moak, Timothy Callahan	Email re Averill Request – Rent and Related Variances	AC/WP/Supervision/Oversight
115	4/3/2002	Al Lawrence	Bruce Lerner	Charles Callahan, Timothy Callahan, Roger Moak	Email re Averill Request – Rent and Related Variances	AC/WP/Supervision/Oversight

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
116	4/3/2002	Al Lawrence	Joseph Campbell	Charles Callahan, Timothy Callahan, Roger Moak	Email re Averill Request – IT Variances	AC/WP/Supervision/Oversight
117	4/10/2002	Roger Moak	Al Lawrence	Joel Ross, Timothy Callahan	Email re Averill Request – General Counsel's Office	AC/WP/Supervision/Oversight
118	4/10/2002	Al Lawrence	Roger Moak	Timothy Callahan, Joel Ross	Email re Averill Request – General Counsel's Office	AC/WP/Supervision/Oversight
119	5/28/2002	Charles Callahan	Al Lawrence	Maria Croce, Peter Johnson, Roger Moak, Timothy Callahan	Email re Averill Visit – June 5 <sup>th</sup>	AC/WP/Supervision/Oversight
120	5/28/2002	Al Lawrence	Charles Callahan, Timothy Callahan, Peter Johnson, Roger Moak	Maria Croce	Email re Averill Visit – June 5 <sup>th</sup>	AC/WP/Supervision/Oversight
121	6/5/2002	Al Lawrence	Charles Callahan, Timothy Callahan, Peter Johnson, Roger Moak	Maria Croce	Email re Averill Visit	AC/WP/Supervision/Oversight
122	8/31/2000	Tim McIntyre	Dave Bowers	Roger Moak, Joseph Campbell	Email re Information Technology Services Agreement	AC/WP
123	7/11/2000	Tim McIntyre	Charles Callahan, Timothy Callahan, Joseph Campbell, Michael Foley	Roger Moak	Email re revised outsourcing agreement	AC/WP
124	12/11/2000	Iris Engels	Thomas Grogan	Tom Kober, Tim McIntyre, Roger Moak	Email re Privileged and Confidential – REM Ownership	AC/WP
125	9/21/2000	Tim McIntyre	Joseph Campbell	Roger Moak	Email re REM/ZTS Service Agreement – NY Comments	AC/WP
126	8/2/2000	Tim McIntyre	Joseph Campbell	Roger Moak, Charles Callahan, Timothy Callahan	Email re proposed assignment of licenses	AC/WP
127	7/31/2000	Tim McIntyre	Joseph Campbell, Timothy Callahan, Roger Moak		Email re Zurich Outsourcing Agreement	AC/WP
128	1/10/2000	Tim McIntyre	Roger Moak		Email re REM Guaranty	AC/WP
129	1/10/2000	Tim McIntyre	Roger Moak		Email re REM Guaranty	AC/WP
130	6/8/2000	Roger Moak	Tim McIntyre		Zurich Technology Services Mainframe and AS400 Hosting Agreement	AC/WP
131	1/10/2000	Tim McIntyre	Roger Moak		Email re REM Guaranty	AC/WP
132	10/26/1998	Al Lawrence	Joseph Campbell, Roger Moak, Bert Morton, Gary	Timothy Callahan	Email re 1999 Budget Adjustments	AC/WP

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
			Napolitano, Michael Riney, Bruce Lerner, Michael Foley, Jonathan Rosen, Jonathan Terrell, Arthur Wilson, Michael Brambier			
133	5/31/2002	Timothy Callahan	Al Lawrence	Timothy Callahan, Roger Moak, maria Croce	Email re Averill Request – Cranbury Visit	AC/WP/Supervision/Oversight
134	5/28/2002	Charles Callahan	Al Lawrence	Maria Croce, Peter Johnson, Roger Moak, Timothy Callahan	Email re Averill Visit – June 5 <sup>th</sup>	AC/WP/Supervision/Oversight
135	2/12/2002	Roger Moak	Michael Riney, Timothy Callahan, Al Lawrence, Tom Kobert, Terry Scrivani, Maria Croce, Tim McIntyre	Nellie Gomez, Winnie Moy	Email re Mike Averill Visit	AC/WP/Supervision/Oversight
136	1/18/2002	Al Lawrence	Roger Moak	Arthur Wilson	Email re Averill Requests	AC/WP/Supervision/Oversight
137	12/18/2001	Al Lawrence	Roger Moak		Email re Management Reports	AC/WP
138	4/5/2000	Al Lawrence	Raimund Angeles, Alice Ling, Frank Parker, Theresa Rago, Richard Wygand	Timothy Callahan, Karl Moller, Jonathan Rosen, Maria Croce, Jack Schwartz, Helene Steinberg, Arthur Wilson	Email re Reinsurance Timekeeping	AC/WP
139	7/13/1999	Tim McIntyre	Al Lawrence	Timothy Callahan, Roger Moak, Maria Croce, Warren LaPenta	Email re REM Leases	AC/WP
140	3/6/2000	Bruce Lerner	Tim McIntyre		Email re Dallas Premises	AC/WP
141	4/11/2000	William Kotansky	Tim McIntyre	Bob Windsor	Email re Lease at 2540 Route 130	AC/WP
142	5/3/2000	Tim McIntyre	William Kotansky	Bruce Lerner	Email re 2540 Route 130, inducement letter	AC/WP
143	1/10/2000	Tim McIntyre	Bruce Lerner		Email re Estoppel Certificates 59 Maiden Lane	AC/WP
144	3/6/2000	Bruce Lerner	Tim McIntyre		Email re Home Insurance – Lease Agreement – Park Central – TX	AC/WP
145	5/5/2000	Bruce Lerner	Tim McIntyre		Email re Brea Sublease	AC/WP
146	5/2/2000	Tim McIntyre	William Kotansky	Bruce Lerner	Email re Risk Enterprise Management Lease	AC/WP
147	9/15/2000	Lester Baer	Michael Foley,	Tim McIntyre	Email re [non-Zurich policy holder]	AC/WP



No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
148	7/18/2000	Tim McIntyre	Anthony Trentacosti, Lou Nieves, John Hafner, Anna Grasso, Ronald Riddehough, Joe Roper	Joseph Campbell	Email re Zurich Outsourcing; Cancellation or Modification of Home Insurance Contracts	AC/WP
149	7/19/2000	Anthony Trentacosti	Tim McIntyre	Michael Foley, Lester Baer, Joseph Campbell	Email re Zurich Outsourcing; Cancellation or Modification of Home Insurance Contracts	AC/WP
150	7/21/2000	Michael Malak	Tim McIntyre	Warren jankelow, Denis Gingue	Email re Zurich Outsourcing Agreement	AC/WP
151	7/21/2000	Tim McIntyre	Michael Malak	Joseph Campbell	Email re Zurich Outsourcing Agreement	AC/WP
152	7/21/2000	Tim McIntyre	Michael Malak	Joseph Campbell	Email re Zurich Outsourcing Agreement	AC/WP
153	7/31/2000	Tim McIntyre	Michael Foley		Email re Zurich Outsourcing Agreement	AC/WP
154	2/15/2000	Bob Windsor	Bruce Lerner	Tim McIntyre, Michael Foley, Roy Schumacher	Email re Dallas	AC/WP
155	8/11/2000	Tim McIntyre	Michael Malak	Joseph Campbell	Email re Zurich -- REM agreement	AC/WP
156	8/15/2000	Michael Malak	Tim McIntyre		Email re Zurich -- REM agreement	AC/WP
157	8/16/2000	Tim McIntyre	Michael Malak		Email re Zurich -- REM agreement	AC/WP
158	8/16/2000	Michael Malak	Tim McIntyre		Email re Zurich -- REM agreement	AC/WP
159	8/16/2000	Tim McIntyre	Michael Malak	Joseph Campbell	Email re Zurich -- REM agreement	AC/WP
160	8/16/2000	Tim McIntyre	Thomas Grogan	Betsy Bourque	Email re Zurich -- REM agreement	AC/WP
161	8/17/2000	Thomas Grogan	Michael Malak	Tim McIntyre, Betsy Bourque	Email re Zurich -- REM agreement	AC/WP
162	8/28/2000	Bruce Lerner	Tim McIntyre		Email re Brea Sublease	AC/WP
163	3/24/2000	Bruce Lerner	Bob Windsor	Michael Foley, Tim McIntyre	Email re Zurich -- Home Agreement	AC/WP
164	3/2/2000	Tim McIntyre	Bob Windsor	Bruce Lerner	Email re Dallas Lease Termination	AC/WP
165	8/31/2000	Dave Bowers	Tim McIntyre		Email re REM/Zurich Services Agreement	AC/WP
166	9/12/2000	Tim McIntyre	Joseph Campbell		Email re REM -- Home assignment of Dom licenses	AC/WP
167	9/13/2000	Tim McIntyre			Email re Dom contract assignment	AC/WP
168	9/13/2000	Tim McIntyre	Michael Malak		Email re OLA - Operating Level Agreement	AC/WP
169	9/14/2000	Tim McIntyre	Michael Malak		Email re ZTS/REM Consolidation	AC/WP
170	9/18/2000	Tim McIntyre	Michael Malak		Email re Zurich -- REM Data Center Outsourcing Agreement	AC/WP
171	9/18/2000	Tim McIntyre	Michael Malak		Email re Information Technology Services Agreement and Operating Level Agreement	AC/WP
172	3/2/2000	Bob Windsor	Tim McIntyre	Bruce Lerner, William Kotansky	Email re Dallas Lease Termination	AC/WP

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
173	9/20/2000	Michael Malak	Denis Gingue	Warren Jankelow, Tim McIntyre	Email re REM/ZTS Service Agreement (Consolidated Datacenter)	AC/WP
174	9/20/2000	Tim McIntyre	Michael Malak	Joseph Campbell	Email re REM/ZTS Service Agreement (Consolidated Datacenter)	AC/WP
175	9/20/2000	Michael Malak	Tim McIntyre	Dave Bowers	Email re REM/ZTS Service Agreement – NY Comments	AC/WP
176	9/26/2000	Tim McIntyre	Joseph Campbell	Michael Foley	Email re REM/ZTS Service Agreement PAR 1026	AC/WP/Supervision/Oversight
177	10/6/2000	Tim McIntyre	Michael Malak	Joseph Campbell	Email re REM-Zurich Outsourcing Agreement	AC/WP
178	2/22/2000	Tim McIntyre	Al Lawrence	Timothy Callahan	Email re Outsourcing Charges	AC/WP
179	1/25/2002	Al Lawrence	Roger Moak	Timothy Callahan, Arthur Wilson	Email re Tatti Requests	AC/WP/Supervision/Oversight
180	4/11/2000	Tim McIntyre	William Kotansky		Email re Lease at 2540 Route 180	AC/WP
181	9/15/2000	Michael Malak	Tim McIntyre		Email re OLA Status	AC/WP
182	4/10/2000	William Kotansky	Tim McIntyre		Email re Guaranty Form	AC/WP
183	4/10/2000	Tim McIntyre	Bruce Lerner		Email re Guaranty Form	AC/WP
184	3/14/2000	Bruce Lerner	Tim McIntyre		Email re Dallas	AC/WP
185	3/14/2000	Tim McIntyre	Bruce Lerner	William Kotansky	Email re Zurich Dallas letter	AC/WP
186	3/14/2000	Tim McIntyre	Bob Windsor, William Kotansky		Email re Dallas	AC/WP
187	3/14/2000	Tim McIntyre	Bob Windsor, William Kotansky	Bruce Lerner	Email re Zurich-Home Agreement	AC/WP
188	3/15/2000	Bob Windsor	Tim McIntyre	William Kotansky, Bruce Lerner	Email re Zurich-Home Agreement	AC/WP
189	3/27/2000	Bruce Lerner	Tim McIntyre		Email re Guaranty for REM	AC/WP
190	3/27/2000	Bruce Lerner	Tim McIntyre		Email re Guaranty of Lease	AC/WP
191	3/28/2000	William Kotansky	Tim McIntyre	Bob Windsor	Email re REM Lease Guaranty	AC/WP
192	3/28/2000	Tim McIntyre	William Kotansky	Bruce Lerner	Email re REM Lease Guaranty	AC/WP
193	11/7/2000	Tim McIntyre	Dave Bowers	Tim McIntyre, Bob Windsor	Email re Guaranty of Equipment Lease Payments	AC/WP
194	4/10/2000	William Kotansky	Jennifer Katz		Email re fax from Tim McIntyre	AC/WP
195	3/29/2000	Bruce Lerner	Tim McIntyre		Email re Zurich American Insurance Company Financial Strmts	AC/WP
196	1/23/2001	Maria Croce	Al Lawrence		Email re Bonus Accrual by Function 2000	AC/WP
197	4/17/2001	Michael Riney	Tom Kober, Paula Maguire, Kevin Kelly, Michael Brambier		Email re Timekeeping – New Hampshire Requests	AC/WP/Supervision/Oversight
198	4/17/2001	Michael Riney	Tom Kober, Paula Maguire, Kevin Kelly, Michael Brambier		Email re Timekeeping – New Hampshire Requests	AC/WP/Supervision/Oversight
199	10/27/1999	Al Lawrence	Distribution	Distribution	Email re 2000 Home Budget – Travel Adjustment	AC/WP

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
200	10/4/1999	Raimund Angeles	Michael Brambier	Al Lawrence	Email re Home Insurance Budget	AC/WP
201	8/11/1999	Michael Riney	Michael Brambier		Email re Accounting for Revenues and Expense Reimbursements	AC/WP
202	1/15/1999	Michael Brambier	Al Lawrence	Patricia Martini	Email re Timekeeping – "Dummy Claim Numbers"	AC/WP
203	10/27/1998	Michael Brambier	Maria Croce		Email re 1999 Budget Adjustments	AC/WP
204	10/27/1998	Michael Riney	Michael Brambier		Email re 1999 Budget Adjustments	AC/WP
205	4/14/2003	Timothy Callahan	Ray Tatti, Peter Bengelsdorf, Michael Averill, Angela Anglum	Charles Callahan, Peter Johnson, Joseph Campbell, Tim McIntyre	Email re [non-Zurich policy holder] Seat License Assignment and attachment	AC/WP/Supervision/Oversight
206	4/8/2003	Roger Moak	Martin Gross	Joel Ross	Email re NHID Proposal re Indemnification and Expense Reimbursement	AC/WP/Supervision/Oversight
207	12/4/2002	Martin Gross	Roger Moak	Jeff Liebmann, Martin Gross	Email re Home	AC/WP
208	12/4/2002	Martin Gross	Jeff Liebmann	Martin Gross, Roger Moak	Email re Home	AC/WP
209	12/4/2002	Jeff Liebmann	Martin Gross	Martin Gross	Email re Home	AC/WP
210	8/6/2002	Roger Moak	Tim McIntyre	Joel Ross	Email re Follow-up materials with attachment	AC/WP
211	6/30/1999	Iris Engels	David Bowers, James March	Timothy Callahan, Roger Moak, Michael Nevens, Arthur Wilson	Memo re REM's Principal: The Home Insurance Company Letter Agreement between Zurich American Insurance Company and The Home Insurance Company	AC/WP
212	8/7/2001	Martin Gross	Roger Moak		Letter re Nature of Commissioner's authority to seize, liquidate or rehabilitate	AC/WP
213	5/8/2003	Martin Gross	Roger Moak		Fax re draft balance sheet with hand written notes	AC/WP
214	5/2/2003	Roger Moak	Charles Callahan	Peter Johnson, Michael Riney, Timothy McIntyre, Joel Ross	Email re REM's Principal: The Home Insurance Company	AC/WP
215	5/2/2003	Roger Moak	Charles Callahan	Peter Johnson, Michael Riney, Timothy Callahan, Tim McIntyre, Joel Ross	Email re draft amendment of July 2000 letter	AC/WP
216	6/28/1999	David Bowers	Roger Moak		Letter re Settlement Amount	AC/WP
217	6/30/1999	Iris Engels	David Bowers, James March		REM's Principal: The Home Insurance Company Letter Agreement between Zurich American Insurance Company and The Home Insurance Company	AC/WP
218	5/18/1998				Draft Guide for complying with NHID Order of Supervision	AC/WP/Supervision/Oversight
219	5/6/1991	Joel Ross	Distribution		Fax re article on Home	AC/WP
220	7/28/2003	Martin Honigberg	Roger Moak		Fax re Home Liquidation	AC/WP

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
221	7/15/2003	Peter Johnson	Timothy Callahan, Tim McIntyre, Joel Ross		Email re The Home – REM Agreements with attachment	AC/WP
222	7/15/2003	Tim McIntyre	Timothy Callahan		Email re The Home – REM draft agreements	AC/WP
223	7/14/2003	Tim McIntyre	Rackemann Attorney	Peter Johnson, Charles Callahan, Roger Moak, Joel Ross	Email re The Home – REM draft agreements with attachment	AC/WP
224	7/11/2003	Tim McIntyre	Joel Ross		Email re Asset Purchase Agreement Section 2(a)	AC/WP
225	7/11/2003	Roger Moak	Time McIntyre, Joel Ross, Timothy Callahan		Email re Draft agreements	AC/WP
226	7/9/2003	Roger Moak	Martin Honigberg	Jeff Liebmann, Martin Gross, Charles Callahan, Peter Johnson, Tim McIntyre, Joel Ross	Email re contract drafts	AC/WP
227	6/26/2003	Martin Gross	Roger Moak, Joel Ross, Jeff Liebmann	Martin Gross, Sulloway Attorney, Martin Honigberg	Email re Home – REM Transitional Services Agreement – Draft Term Sheet	AC/WP
228	6/21/1995		Distribution	Peter Johnson	Memo re REM Questions/Concerns	AC/WP
229	3/26/2003	Thomas Grogan	Roger Moak	Tim McIntyre	Memo re The Home Insurance Company – Mississippi	AC/WP
230	3/6/2003	Paula Rogers	Arthur Wilson		Letter re Rehabilitator of The Home with hand written notes	AC/WP/Supervision/Oversight
231	3/20/2003	Roger Moak	Fran Semaya		Fax re Rehabilitation of The Home Insurance Company	AC/WP
232	3/13/2003	Nelly Gomez on behalf of Roger Moak	Timothy McIntyre		Fax re Assignment, Assumption and Release Agreement	AC/WP
233	3/18/2003	Thomas Grogan	Roger Moak	Tim McIntyre	Memo re The Home Insurance Company – Mississippi with hand written notes	AC/WP
234					Hand written notes re Rehabilitation	AC/WP
235	12/18/1991	Steve Mortimer	Roger Moak		Memo re NYO Effectiveness Study (Andersen Consulting)	AC/WP
236	6/25/2002				Memo re The Andersen Verdict and Its Implications with hand written notes	AC/WP
237	3/3/2003	Joel Ross	Timothy Callahan		Fax re The Home Insurance Company Officers	AC/WP
238	8/5/1999	Joel Ross	Roger Moak		Memo re Home Insurance Company Officers	AC/WP
239	1/8/1999	Iris Engels	Roger Moak		Email re Officers of REM	AC/WP
240	4/24/1995	Steven Kolleeny	Roger Moak		Hearing on Acquisition of the Home Insurance Company of Wisconsin by ZCI Investments Limited	AC/WP
241	3/7/2003	Deborah O'Loughlin	Roger Moak		Fax re Home Rehabilitation Letter "Bank Authorization"	AC/WP
242	4/9/2003	Roger Moak	Charles Callahan,		Email re Incentive Payments and attachment	AC/WP

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
243	2/24/2003		Peter Johnson, Timothy Callahan			
244	5/29/2003	Rackemann, Attorney	Distribution	NHDOJ Attorney, Rackemann, Attorney	Draft Background on the Home 1995 – 2002 Email re The Home – Bengelsdorf affidavit	AC/WP AC/WP/Supervision/Oversight AC/WP
245	5/8/2003	Roger Moak	Timothy McIntyre	Michael Riney	Fax re Verified Petition for Order of Liquidation	AC/WP
246	6/12/2003	Matthew Craig	Roger Moak	Timothy Callahan	Email re Home Proposal	AC/WP
247	6/9/2003	Tim McIntyre	Roger Moak		Email re Opinion of In-house Counsel	AC/WP
248	6/9/2003	Martin Gross	Roger Moak		Fax re Order of Liquidation	AC/WP
249	5/14/2003	Peter Johnson	Michael Riney	Roger Moak, Charles Callahan	Email re Home Ins. Company	AC/WP
250	10/3/2003	Winnie Moy	Peter Johnson, Charles Callahan, Michael Riney, Pamela Tanis		Email re Matter of Rehabilitation/Liquidation of the Home Insurance Company	AC/WP
251	4/30/2003	Frank Parker	Liya Zhou, Al Lawrence, Maria Croce	Kiki Ljunghe-Burke, Richard Wygand	Email re Corrections to Jonathan Rosen's Home Ins hours are complete	AC/WP
252	2/13/200	Al Lawrence	Timothy Callahan, Charles Callahan, Roger Moak	Maria Croce	Email re Averill Requests	AC/WP/Supervision/Oversight
253	11/11/2002	Al Lawrence	Michael Averill	Timothy Callahan, Roger Moak, Maria Croce	Email re Time Allocations – Sept. 2002	AC/WP/Supervision/Oversight
254	10/25/2002	Al Lawrence	Michael Averill	Timothy Callahan, Roger Moak, Maria Croce	Email re Time Allocations	AC/WP/Supervision/Oversight
255	7/22/2002	Al Lawrence	Michael Averill	Timothy Callahan, Roger Moak, Arthur Wilson	Email re May G&A Expense Variances	AC/WP/Supervision/Oversight
256	12/3/2001	Roger Moak	Maria Croce		Email re Home Budget 2002	AC/WP
257	1/22/2001	Bruce Lerner	Tim McIntyre		Email re Brea, CA – Good News	AC/WP
258	10/26/2001	Roger Moak	Michael Averill	Al Lawrence, Ray Tatti	Email re Response to Expense Review Draft Report	AC/WP/Supervision/Oversight
259	11/9/2001	Al Lawrence	Ray Tatti	Timothy Callahan, Roger Moak	Email re Expense Allocation Review	AC/WP/Supervision/Oversight
260	11/16/2001	Al Lawrence	Timothy Callahan, Roger Moak		Email re Expense Allocation Review	AC/WP/Supervision/Oversight
261	12/3/2001	Roger Moak	Michael Averill	Dave Nichols	Email re Home Budget 2002	AC/WP/Supervision/Oversight
262	1/21/2002	Roger Moak	Charles Callahan, Peter Johnson	Al Lawrence, Arthur Wilson	Email re Averill Requests	AC/WP/Supervision/Oversight

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
263	1/28/2008	Roger Moak	Michael Aveerill, Ray Tatti	Al Lawrence, Arthur Wilson, Timothy Callahan	Email re Budget Inquiries	AC/WP/Supervision/Oversight
264	3/13/2002	Al Lawrence	Michael Averill	Roger Moak, Timothy Callahan	Email re Zurich Management Fee	AC/WP/Supervision/Oversight
265	3/13/2002	Al Lawrence	Roger Moak	Timothy Callahan	Email re Expense Allocations – Averill Request	AC/WP/Supervision/Oversight
266	2/27/2002	Al Lawrence	Nellie Gomez	Roger Moak	Email re NHID	AC/WP/Supervision/Oversight
267	3/25/2002	Ray Tatti	Michael Averill	Al Lawrence, Roger Moak	Email re Expense allocation recommendations	AC/WP/Supervision/Oversight
268	4/26/2002	Michael Averill	Al Lawrence	Roger Moak	Email re 2001 Expenses	AC/WP/Supervision/Oversight
269	4/26/2002	Al Lawrence	Michael Averill	Roger Moak	Email re 2001 Expenses	AC/WP/Supervision/Oversight
270	4/26/2002	Al Lawrence	Michael Averill	Roger Moak	Email re 2001 Expenses	AC/WP/Supervision/Oversight
271	9/9/2002	Al Lawrence	Michael Averill	Timothy Callahan, Roger Moak	Email re Requests Visit of August 28 <sup>th</sup>	AC/WP/Supervision/Oversight
272	8/6/2001	Al Lawrence	James Sweeney	Timothy Callahan, Roger Moak, Bert Morton, Maria Croce	Email re Expense Allocation Review – Severance Questions	AC/WP/Supervision/Oversight
273	7/2/2001	Al Lawrence	James Sweeney	Charles Callahan, Timothy Callahan, Roger Moak, Ray Tatti	Email re Expense Allocation Reviews (Tatti Memo of 6/28)	AC/WP/Supervision/Oversight
274	3/9/2001	Al Lawrence	James Sweeney, Ray Tatti	Roger Moak, Timothy Callahan	Email re Home Insurance Expenses	AC/WP/Supervision/Oversight
275	5/2/2003	Al Lawrence	Al Lawrence		Email re Prepaid D&O/E&O Prior Approval Request	AC/WP/Supervision/Oversight
276	3/20/2003	Al Lawrence	Michael Averill	Timothy Callahan, Roger Moak, Arthur Wilson	Email re G&A Expense Variance – January 2003	AC/WP/Supervision/Oversight
277	11/4/2002	Al Lawrence	Michael Averill	Charles Callahan, Timothy Callahan, Roger Moak	Email re G&A Expenses	AC/WP/Supervision/Oversight
278	9/9/2002	Al Lawrence	Michael Averill	Timothy Callahan, Roger Moak; bcc: Al Lawrence	Email re Requests – Visit of August 28 <sup>th</sup>	AC/WP/Supervision/Oversight
279	8/16/2002	Al Lawrence	Michael Averill	Timothy Callahan, Roger Moak, Maria Croce	Email re June Expense Package	AC/WP/Supervision/Oversight
280	2/11/2002	Al Lawrence	Michael Averill, Ray	Timothy Callahan,	Email re Home Insurance 2001 G&A Expenses	AC/WP/Supervision/Oversight

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
			Tatti	Roger Moak, Arthur Wilson; bcc: Maria Croce		ision/Oversight
281	2/27/2002	Al Lawrence	Ray Tatti	Timothy Callahan, Roger Moak, Arthur Wilson	Email re Home G&A Expense Package – Dec. YTD 2001	AC/WP/Supervision/Oversight
282	2/15/2002	Al Lawrence	Ray Tatti	Roger Moak, Timothy Callahan	Email re Home G&A Expense Package	AC/WP/Supervision/Oversight
283	7/2/2001	Al Lawrence	James Sweeney	Charles Callahan, Timothy Callahan, Roger Moak, Ray Tatti	Email re Expense Allocation Reviews (Tatti Memo of 6/28)	AC/WP/Supervision/Oversight
284	4/10/2003	Joel Ross	Al Lawrence	Chris McLoughlin, Maria Croce, Roger Moak, Helene Steinberg, Arthur Wilson	Email re Home Insurance Accruals – Legal Fees	AC/WP
285	4/4/2003	Al Lawrence	Joel Ross	Chris McLoughlin, Maria Croce	Email re Home Insurance Accruals, - Legal Fees	AC/WP
286	4/11/2003	Al Lawrence	Joel Ross, Arthur Wilson	Chris McLoughlin, Maria Croce	Email re Legal Fees Budget	AC/WP
287	3/31/2003	Al Lawrence	Jonathan Rosen	Efraim Abramsohn, Alice Chan, Timothy Callahan	Email re Budget Revisitation	AC/WP
288	3/10/2003	Al Lawrence	James Liell	Jonathan Rosen, Richard Wygand, Maria Croce, Richard Wygand	Email re Timekeeping for February	AC/WP
289	3/19/2003	Al Lawrence	Joseph Campbell, Gary Galante, George Mitchell, Karl Moller, Roger Moak, Gary Napolitano, Jonathan Rosen, Terry Scrivani, Arthur Wilson	Charles Callahan, Timothy Callahan, Maria Croce, Tom Capenter, John Proscio	Email re Budget Revisitation	AC/WP
290	3/5/2003	Al Lawrence	Roger Moak	Timothy Callahan	Email re Recruiting Expenses – Follow-up	AC/WP
291	2/11/2003	Al Lawrence	Roger Moak	Timothy Callahan	Email re Recruiting Expenses	AC/WP
292	12/24/2002	Al Lawrence	Joel Ross, Arthur Wilson	Timothy Callahan, Maria Croce, Chris McLoughlin	Email re Legal Accrual	AC/WP
293	5/13/2003	Al Lawrence	Michael Averill	Timothy Callahan, Roger Moak	Email re D&O/E&O Prior Approval Request	AC/WP/Supervision/Oversight

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
294	7/2/2001	Charles Callahan	Al Lawrence	Roger Moak	Email re Proposed Response to Tatti	AC/WP/Supervision/Oversight
295	7/26/2001	Al Lawrence	Bert Morton	Timothy Callahan, Charles Callahan, Roger Moak	Email re Devito Review – Severanc	AC/WP/Supervision/Oversight
296	8/2/2001	Roger Moak	Tim McIntyre, Michael Foley	Joseph Campbell, Timothy Callahan, Al Lawrence	Email re Ray Tatti request	AC/WP/Supervision/Oversight
297	8/3/2001	Tim McIntyre	Roger Moak	Al Lawrence, Joseph Campbell, Michael Foley, Timothy Callahan	Email re Ray Tatti request – Privileged and Confidential	AC/WP/Supervision/Oversight
298	8/6/2001	Al Lawrence	Timothy Callahan, Roger Moak	Maria Croce	Email re Addendum: Expense allocation review – Admin Allocations	AC/WP
299	2/13/2003	Al Lawrence	Timothy Callahan, Charles Callahan, Roger Moak	Maria Croce	Email re Averill Requests	AC/WP/Supervision/Oversight
300	4/1/2003	Timothy Callahan	Peter Johnson, Charles Callahan, Roger Moak	Al Lawrence	Email re April Funding Request	AC/WP
301	4/29/2003	Al Lawrence	Joel Ross	Timothy Callahan, Roger Moak, Arthur Wilson	Email re Home G&A Expense Package	AC/WP
302	10/27/1999	Al Lawrence	Michael Brambeir, Timothy Callahan, Tom Carpenter, Audra Guscott, Karen Hein, Bruce Lerner, Perry LaMorte, Karl Moller, Gary Napolitano, John Proscio, Helene Steinberg, Arthur Wilson	Joseph Campbell, Geroge Mitchell, Roger Moak, Bert Morton, Jonathan Rosen, Jonathan Terrell, Ifigenia Alvanos	Email re 2000 Home Budget – Travel Adjustment	AC/WP
303	4/5/2000	Al Lawrence	Raimund Angeles, Alice Ling, Frank Parker, Theresa Rago, Richard Wygand	Timothy Callahan, Karl Moller, Jonathan Rosen, Maria Croce, Jack Schwartz, Helene Steinberg, Arthur Wilson	Email re Reinsurance Timekeeping	AC/WP
304	4/17/2001	Roger Moak	Al Lawrence	Karl Moller, Michael	Email re NHID Requests for Information	AC/WP/Supervision/Oversight



No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
				Riney, Tom Kober, Kevin Kelly, Jonathan Rosen, George Mitchell, Arthur Wilson, Jonathan Terrell, Gary Napolitano, Joseph Campbell, Bert Morton		ision/Oversight
305	5/1/2001	Al Lawrence	Roger Moak	Timothy Callahan, Arthur Wilson	Email re ALAE Costs Incurred on Behalf of Home	AC/WP
306	10/25/1999	Ifigenia Alvanos	Michael Brambier, Tom Carpenter, Audra Guscott, Karen Hein, Perry LaMorte, Al Lawrence, Bruce Lerner, Karl Moller, Gary Napolitano, John Proscio, Helene Steingerg, Arthur Wilson	Michael Riney, Joseph Campbell, Jonathan Terrell, Roger Moak, Jonathan Rosen, Timothy Callahan, George Mitchell, Bert Morton	Email re Travel and Training Reductions – Home Client	AC/WP
307	7/17/2001	Al Lawrence	Roger Moak	Timothy Callahan, Maria Croce	Email re DeVito Request – Outside Services Allocations	AC/WP/Supervision/Oversight
308	12/27/2002	Arthur Wilson	Al Lawrence	Chris McLoughlin, Joel Ross, Maria Croce, Timothy Callahan	Email re Legal Accrual	AC/WP
309	1/18/1999	Al Lawrence	Jonathan Rosen, Jonathan Terrell, Karen Bennett	Michael Brambier, Timothy Callahan, Maria Croce, Karl Moller, Patricia Martini, Roger Moak, Helene Steinberg, Arthur Wilson	Email re Timekeeping – ALAE Expense Transfers	AC/WP
310	11/11/2002	Al Lawrence	Maria Croce, Chris McLoughlin	Arthur Wilson	Email re December Home Funding	AC/WP
311	8/16/2002	Roger Moak	Al Lawrence	Timothy Callahan	Email re Home Expense Package – June	AC/WP
312	11/1/2002	Al Lawrence	Stephen Eisenmann, Jonathan Rosen, George Mitchell, Karl Moller, Arthur	Timothy Callahan	Email re Home Related Headcount Targets	AC/WP

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
313	6/5/2002	Al Lawrence	Wilson, Gary Napolitano, Roger Moak Charles Callahan, Timothy Callahan, Peter Johnson, Roger Moak	Maria Croce	Email re Averill Visit	AC/WP/Supervision/Oversight
314	1/4/2002	Al Lawrence	Roger Moak	Timothy Callahan	Email re Averill Inquirey	AC/WP/Supervision/Oversight
315	2/8/2002	Roger Moak	Al Lawrence	Timothy Callahan	Email re Tatti Request – 2001 G&A Expenses	AC/WP/Supervision/Oversight
316	1/31/200	Al Lawrence	Roger Moak	Timothy Callahan	Email re Draft Response Zurich Management Fees	AC/WP/Supervision/Oversight
317	2/13/2002	Al Lawrence	Roger Moak	Timothy Callahan, Maria Croce	Email re Tatti Request – Home G&A Expense Package	AC/WP/Supervision/Oversight
318	2/11/2002	Timothy Callahan	Roger Moak	Al Lawrence	Email re Draft Response Zurich Management Fees	AC/WP/Supervision/Oversight
319	2/14/2002	Al Lawrence	Roger Moak	Timothy Callahan	Email re Draft Response Zurich Management Fees	AC/WP/Supervision/Oversight
320	2/14/2002	Al Lawrence	Roger Moak	Timothy Callahan	Email re Tatti Request	AC/WP/Supervision/Oversight
321	2/13/2002	Roger Moak	Al Lawrence	Timothy Callahan	Email re Tatti Request	AC/WP/Supervision/Oversight
322	4/10/2002	Roger Moak	Al Lawrence	Joel Ross, Timothy Callahan, Arthur Wilson	Email re Averill Request – General Counsel's Office	AC/WP/Supervision/Oversight
323	4/8/2002	Roger Moak	Al Lawrence	Timothy Callahan	Email re Averill Request – General Counsel's Office	AC/WP/Supervision/Oversight
324	4/8/2002	Bruce Lerner	Al Lawrence	Charles Callahan, Roger Moak, Timothy Callahan	Email re Averill Request – Rent and Related Variances	AC/WP/Supervision/Oversight
325	4/3/2002	Al Lawrence	Bruce Lerner	Charles Callahan, Timothy Callahan, Roger Moak	Email re Averill Request – Rent and Related Variances	AC/WP/Supervision/Oversight
326	4/3/2002	Al Lawrence	Joseph Campbell	Charles Callahan, Timothy Callahan, Roger Moak	Email re Averill Request – IT Variances	AC/WP/Supervision/Oversight
327	4/10/2002	Roger Moak	Al Lawrence	Joel Ross, Timothy Callahan	Email re Averill Request – General Counsel's Office	AC/WP/Supervision/Oversight
328	4/10/2002	Al Lawrence	Roger Moak	Timothy Callahan, Joel Ross	Email re Averill Request – General Counsel's Office	AC/WP/Supervision/Oversight
329	5/28/2002	Charles Callahan	Al Lawrence	Maria Croce, Peter Johnson, Roger	Email re Averill Visit – June 5 <sup>th</sup>	AC/WP/Supervision/Oversight

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
330	5/28/2002	Al Lawrence	Charles Callahan, Timothy Callahan, Peter Johnson, Roger Moak	Moak, Timothy Callahan Maria Croce	Email re Averill Visit – June 5 <sup>th</sup>	AC/WP/Supervision/Oversight
331	6/5/2002	Al Lawrence	Charles Callahan, Timothy Callahan, Peter Johnson, Roger Moak	Maria Croce	Email re Averill Visit	AC/WP/Supervision/Oversight
332	6/27/2002	Michael Riney	Paula McGuire, Matthew Craig, Michael Brambier		Email re Home Insurance Banking	AC/WP
333	8/31/2000	Tim McIntyre	Dave Bowers	Roger Moak, Joseph Campbell	Email re Information Technology Services Agreement	AC/WP
334	7/11/2000	Tim McIntyre	Charles Callahan, Timothy Callahan, Joseph Campbell, Michael Foley	Roger Moak	Email re revised outsourcing agreement	AC/WP
335	12/11/2000	Iris Engels	Thomas Grogan	Tom Kober, Tim McIntyre, Roger Moak	Email re Privileged and Confidential – REM Ownership	AC/WP
336	9/21/2000	Tim McIntyre	Joseph Campbell	Roger Moak	Email re REM/ZTS Service Agreement – NY Comments	AC/WP
337	8/2/2000	Tim McIntyre	Joseph Campbell	Roger Moak, Charles Callahan, Timothy Callahan	Email re proposed assignment of licenses	AC/WP
338	7/31/2000	Tim McIntyre	Joseph Campbell, Timothy Callahan, Roger Moak		Email re Zurich Outsourcing Agreement	AC/WP
339	1/10/2000	Tim McIntyre	Roger Moak		Email re REM Guaranty	AC/WP
340	1/10/2000	Tim McIntyre	Roger Moak		Email re REM Guaranty	AC/WP
341	6/8/2000	Roger Moak	Tim McIntyre		Zurich Technology Services Mainframe and AS400 Hosting Agreement	AC/WP
342	1/10/2000	Tim McIntyre	Roger Moak		Email re REM Guaranty	AC/WP
343	10/26/1998	Al Lawrence	Joseph Campbell, Roger Moak, Bert Morton, Gary Napolitano, Michael Riney, Bruce Lerner, Michael Foley, Jonathan Rosen, Jonathan Terrell, Arthur Wilson,	Timothy Callahan	Email re 1999 Budget Adjustments	AC/WP

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
			Michael Brambier			
344	5/31/2002	Timothy Callahan	Al Lawrence	Timothy Callahan, Roger Moak, maria Croce	Email re Averill Request – Cranbury Visit	AC/WP/Supervision/Oversight
345	5/28/2002	Charles Callahan	Al Lawrence	Maria Croce, Peter Johnson, Roger Moak, Timothy Callahan	Email re Averill Visit – June 5 <sup>th</sup>	AC/WP/Supervision/Oversight
346	2/12/2002	Roger Moak	Michael Riney, Timothy Callahan, Al Lawrence, Tom Kober, Terry Scrivani, Maria Croce, Tim McIntyre	Nellie Gomez, Winnie Moy	Email re Mike Averill Visit	AC/WP/Supervision/Oversight
347	1/18/2002	Al Lawrence	Roger Moak	Arthur Wilson	Email re Averill Requests	AC/WP/Supervision/Oversight
348	12/18/2001	Al Lawrence	Roger Moak		Email re Management Reports	AC/WP/Supervision/Oversight
349	7/13/1999	Tim McIntyre	Al Lawrence	Timothy Callahan, Roger Moak, Maria Croce, Warren LaPenta	Email re REM Leases	AC/WP
350	6/8/2000	Tim McIntyre	Dave Bowers	Roger Moak	Email re Zurich Technology Services Mainframe and AS400 Hosting Agreement	AC/WP
351	3/6/2000	Bruce Leriner	Tim McIntyre		Email re Dallas Premises	AC/WP
352	4/11/2000	William Kotansky	Tim McIntyre	Bob Windsor	Email re Lease at 2540 Route 130	AC/WP
353	5/3/2000	Tim McIntyre	William Kotansky	Bruce Lerner	Email re 2540 Route 130, inducement letter	AC/WP
354	1/10/2000	Tim McIntyre	Bruce Lerner		Email re Estoppel Certificates 59 Maiden Lane	AC/WP
355	3/6/2000	Bruce Lerner	Tim McIntyre		Email re Home Insurance – Lease Agreement – Park Central – TX	AC/WP
356	5/5/2000	Bruce Lerner	Tim McIntyre		Email re Brea Sublease	AC/WP
357	5/2/2000	Tim McIntyre	William Kotansky	Bruce Lerner	Email re Risk Enterprise Management Lease	AC/WP
358	4/17/2000	Bruce Lerner	Bob Windsor	Tim McIntyre	Email re Zurich-Home Agreement	AC/WP
359	2/15/2000	Bruce Leriner	Bob Windsor	Tim McIntyre, Michael Foley	Email re Dallas	AC/WP
360	6/9/2000	Dave Bowers	Michael Malak	Tim McIntyre	Email re Zurich Technology Services Mainframe and AS400 Hosting Agreement	AC/WP
361	7/18/2000	Tim McIntyre	Michael Foley Anthony Trentacosti	Joseph Campbell	Email re Zurich Outsourcing; Cancellation or Modification of Home Insurance Contracts	AC/WP
362	7/19/2000	Anthony Trentacosti	Tim McIntyre	Michael Foley, Lester Baer, Joseph Campbell	Email re Zurich Outsourcing; Cancellation or Modification of Home Insurance Contracts	AC/WP

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
363	7/21/2000	Michael Malak	Tim McIntyre	Warren Jankelow, Denis Gingue	Email re Zurich Outsourcing Agreement	AC/W/P
364	7/21/2000	Tim McIntyre	Michael Malak	Joseph Campbell	Email re Zurich Outsourcing Agreement	AC/W/P
365	7/21/2000	Tim McIntyre	Michael Malak	Joseph Campbell	Email re Zurich Outsourcing Agreement	AC/W/P
366	7/31/2000	Tim McIntyre	Michael Foley		Email re Zurich Outsourcing Agreement	AC/W/P
367	2/15/2000	Bob Windsor	Bruce Lerner	Tim McIntyre, Michael Foley, Roy Schurmacher	Email re Dallas	AC/W/P
368	8/11/2000	Tim McIntyre	Michael Malak	Joseph Campbell	Email re Zurich – REM agreement	AC/W/P
369	8/15/2000	Michael Malak	Tim McIntyre		Email re Zurich – REM agreement	AC/W/P
370	8/16/2000	Tim McIntyre	Michael Malak		Email re Zurich – REM agreement	AC/W/P
371	8/16/2000	Michael Malak	Tim McIntyre		Email re Zurich – REM agreement	AC/W/P
372	8/16/2000	Tim McIntyre	Michael Malak	Joseph Campbell	Email re Zurich – REM agreement	AC/W/P
373	8/16/2000	Tim McIntyre	Thomas Grogan	Betsy Bourque	Email re Zurich – REM agreement	AC/W/P
374	8/17/2000	Thomas Grogan	Michael Malak	Tim McIntyre, Betsy Bourque	Email re Zurich – REM agreement	AC/W/P
375	8/28/2000	Bruce Lerner	Tim McIntyre		Email re Brea Sublease	AC/W/P
376	3/24/2000	Bruce Lerner	Bob Windsor	Michael Foley, Tim McIntyre	Email re Zurich – Home Agreement	AC/W/P
377	3/2/2000	Tim McIntyre	Bob Windsor	Bruce Lerner	Email re Dallas Lease Termination	AC/W/P
378	8/31/2000	Dave Bowers	Tim McIntyre		Email re REM/Zurich Services Agreement	AC/W/P
379	9/12/2000	Tim McIntyre	Joseph Campbell		Email re REM – Home assignment of Dorn licenses	AC/W/P
380	9/13/2000	Tim McIntyre			Email re Dorn contract assignment	AC/W/P
381	9/13/2000	Tim McIntyre	Michael Malak		Email re OLA - Operating Level Agreement	AC/W/P
382	9/14/2000	Tim McIntyre	Michael Malak		Email re ZTS/REM Consolidation	AC/W/P
383	9/18/2000	Tim McIntyre	Michael Malak		Email re Zurich – REM Data Center Outsourcing Agreement	AC/W/P
384	9/18/2000	Tim McIntyre	Michael Malak		Email re Information Technology Services Agreement and Operating Level Agreement	AC/W/P
385	3/2/2000	Bob Windsor	Tim McIntyre	Bruce Lerner, William Kotansky	Email re Dallas Lease Termination	AC/W/P
386	9/20/2000	Michael Malak	Denis Gingue	Warren Jankelow, Tim McIntyre	Email re REM/ZTS Service Agreement (Consolidated Datacenter)	AC/W/P
387	9/20/2000	Tim McIntyre	Michael Malak	Joseph Campbell	Email re REM/ZTS Service Agreement (Consolidated Datacenter)	AC/W/P
388	9/20/2000	Michael Malak	Tim McIntyre	Dave Bowers	Email re REM/ZTS Service Agreement – NY Comments	AC/W/P
389	9/26/2000	Tim McIntyre	Joseph Campbell	Michael Foley	Email re REM/ZTS Service Agreement PAR 1026	AC/W/P
390	10/6/2000	Tim McIntyre	Michael Malak	Joseph Campbell	Email re REM-Zurich Outsourcing Agreement	AC/W/P
391	2/22/2000	Tim McIntyre	Al Lawrence	Timothy Callahan	Email re Outsourcing Charges	AC/W/P
392	1/25/2002	Al Lawrence	Roger Moak	Timothy Callahan, Arthur Wilson	Email re Tatti Requests	AC/W/P/Supervision/Oversight
393	4/11/2000	Tim McIntyre	William Kotansky		Email re Lease at 2540 Route 180	AC/W/P

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
394	9/15/2000	Michael Malak	Tim McIntyre		Email re OLA Status	AC/WP
395	4/10/2000	William Kotansky	Tim McIntyre		Email re Guaranty Form	AC/WP
396	4/10/2000	Tim McIntyre	Bruce Lerner		Email re Guaranty Form	AC/WP
397	3/14/2000	Bruce Lerner	Tim McIntyre		Email re Dallas	AC/WP
398	3/14/2000	Tim McIntyre	Bruce Lerner	William Kotansky	Email re Zurich Dallas letter	AC/WP
399	3/14/2000	Tim McIntyre	Bob Windsor, William Kotansky		Email re Dallas	AC/WP
400	3/14/2000	Tim McIntyre	Bob Windsor, William Kotansky	Bruce Lerner	Email re Zurich-Home Agreement	AC/WP
401	3/15/2000	Bob Windsor	Tim McIntyre	William Kotansky, Bruce Lerner	Email re Zurich-Home Agreement	AC/WP
402	3/27/2000	Bruce Lerner	Tim McIntyre		Email re Guaranty for REM	AC/WP
403	3/27/2000	Bruce Lerner	Tim McIntyre		Email re Guaranty of Lease	AC/WP
404	3/28/2000	William Kotansky	Tim McIntyre	Bob Windsor	Email re REM Lease Guaranty	AC/WP
405	3/28/2000	Tim McIntyre	William Kotansky	Bruce Lerner	Email re REM Lease Guaranty	AC/WP
406	11/7/2000	Tim McIntyre	Dave Bowers		Email re Guaranty of Equipment Lease Payments	AC/WP
407	4/10/2000	William Kotansky	Jennifer Katz	Tim McIntyre, Bob Windsor	Email re fax from Tim McIntyre	AC/WP
408	3/29/2000	Bruce Lerner	Tim McIntyre		Email re Zurich American Insurance Company Financial Stmt	AC/WP
409	5/2/2000	Tim McIntyre	William Kotansky		Email re 2540 Rt 130	AC/WP
410	3/4/1997	Edward Novotney	Roger Moak		Fax re Home Insurance Co. placed under formal supervision by the New Hampshire Insurance Department	AC/WP/Supervision/Oversight
411	8/6/2003	Roger Moak	Nellie Gomez		Email re July 2003 Staffing Exhibits and attachment	AC/WP
412	2/25/2003	Timothy Callahan	Distribution including Roger Moak, Jonathan Rosen	Peter Johnson, Charles Callahan	Email re Budget Revisitation and attachment	AC/WP
413	1/14/2003	Joel Ross	Al Lawrence	Chris McLoughlin, Maria Croce, Roger Moak, Tim McIntyre	Email re Legal Fees Accrual – REM	AC/WP
414	12/19/2001	Roger Moak	Assistant Commissioner Averill		Memo re Home Management Reports	AC/WP/Supervision/Oversight
415	1/15/2002	Charles Callahan	Roger Moak	Peter Johnson	Email re E&Y	AC/WP/Supervision/Oversight
416	1/15/2002	Michael Averill	Roger Moak		Email re E&Y	AC/WP/Supervision/Oversight
417	1/15/2002	Michael Averill	Joel Ross	Roger Moak	Email re Home Ins	AC/WP/Supervision/Oversight
418	1/15/2002	Tom Kober	Angela Anglum	James Sweeney,	Email re Law Firm PAR 2001	AC/WP/Supervision/Oversight

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
419	1/16/2002	Roger Moak	Michael Averill	Michael Riney, Michael Averill, Roger Moak	Email re Complex Claims Committee Meeting	AC/WP/Supervision/Oversight
420	1/21/2002	Roger Moak		Charles Callahan, Peter Johnson, Michael Riney, Tom Kober, Kevin Kelly	Memo re REM's Principal: The Home Insurance Company	AC/WP
421	1/2002	Mike Averill	Al Lawrence, Art Wilson, Jonathan Rosen, Kevin Kelly, Bert Morton, Tom Kober, Gary Napolitano, K. Moller, G. Mitchell	C. Callahan, P. Johnson	Letter re Prior Approval Requests	AC/WP/Supervision/Oversight
422	3/29/2002	Michael Averill	Roger Moak		Email re 2001 G&A Expenses	AC/WP/Supervision/Oversight
423	7/25/2002	Timothy Callahan	Michael Averill	Roger Moak, Terry Scrivani, Al Lawrence	Email re Severance Payments - 2002 and attachment	AC/WP/Supervision/Oversight
424	4/26/2002	Michael Averill	Al Lawrence	Roger Moak	Email re 2001 Expenses and attachment	AC/WP/Supervision/Oversight
425	11/1/2001	Paula Rogers	Roger Moak		Letter re Consulting Agreement and attachment	AC/WP/Supervision/Oversight
426	11/1/2001	Roger Moak	Paula Rogers	Michael Averill, Peter Johnson, Charles Callahan	Letter re REM's Principal: The Home Insurance Co.	AC/WP/Supervision/Oversight
427	11/1/2001	Roger Moak	Timothy McIntyre		Fax re Marine Midland Bank v Zurich, et al. and attachment	AC/WP
428	11/9/2001	Al Lawrence	Ray Tatti	Timothy Callahan, Roger Moak	Email re Expense Allocation Review	AC/WP/Supervision/Oversight
429	11/8/2001	Martin Gross	Roger Moak	Fred Potter, Martin Gross	Email re Representative's Contract	AC/WP
430	11/8/2001	Roger Moak	Timothy McIntyre		Fax re Office Property Lease and attachment	AC/WP
431	11/19/2001	Roger Moak	Gary Napolitano	Roger Moak	Email re NHID Reports	AC/WP/Supervision/Oversight
432	11/19/2001	Al Lawrence	Timothy Callahan, Charles Callahan, Roger Moak		Email re Tatti's Response for Support	AC/WP/Supervision/Oversight
433	11/6/2001	Roger Moak	Martin Gross		Fax re Consulting Agreement and attachment	AC/WP
434	11/14/2001	Martin Gross	Roger Moak		Fax re Home/REM - New Contract for Representative and attachment	AC/WP

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
435	11/14/2001	Roger Moak			Handwritten note re Home/REM – New Contract for Representative and attachment	AC/WP
436	12/11/01				Second Supplemental Order of Supervision	AC/WP/Supervision/Oversight
437	11/30/2001	Martin Gross	Roger Moak	Martin Gross	Email re Home/REM/NHID Order	AC/WP/Supervision/Oversight
438	11/20/2001	Roger Moak	Martin Gross		Fax re Confidentiality with hand written notes	AC/WP
439	11/27/2001	Roger Moak	Martin Gross		Fax re confidentiality and attachment	AC/WP
440	11/27/2001	Martin Gross	Roger Moak	Martin Gross	Email re NHID supplemental order	AC/WP/Supervision/Oversight
441	12/14/2001	Martin Gross	Roger Moak		Fax re Second Supplemental Order of Supervision	AC/WP/Supervision/Oversight
442	1/28/2002	Roger Moak	Michael Averill, Ray Tatti	Al Lawrence, Arthur Wilson, Timothy Callahan	Email re budget inquiries	AC/WP/Supervision/Oversight
443	1/28/2002	Roger Moak	Michael Averill, Ray Tatti	Al Lawrence, Arthur Wilson, Timothy Callahan	Email re budget inquiries	AC/WP/Supervision/Oversight
444	1/16/2002	Roger Moak	Jonathan Terrell, Lea Pergolizzi, Kevin Kelly		Email re NHID's Representative	AC/WP/Supervision/Oversight
445	1/16/2002	Roger Moak	Michael Averill	Charles Callahan, Peter Johnson, Michael Riney, Tom Kober, Kevin Kelly	Email re Complex Claims Committee Meeting	AC/WP/Supervision/Oversight
446	12/11/2001	Ernst & Young	David Nichols	Nick Williams	Letter re invoice and attachment	AC/WP/Supervision/Oversight
447	1/24/2002	Thomas Kober	Angela Anglum	Roger Moak	Memo re Zurich Fronted Claims	AC/WP/Supervision/Oversight
448	1/25/2002	Tom Kober	Angela Anglum	Kevin Kelly, Roger Moak	Email re [non-Zurich policy holder]	AC/WP/Supervision/Oversight
449	1/22/2002	Roger Moak	Senior Management	C. Callahan, P. Johnson	Memo re REM's Principal: The Home Insurance Company	AC/WP
450	1/22/2002	Mike Averill	Roger Moak		Memo re Prior Approval Requests with hand written notes	AC/WP/Supervision/Oversight
451	12/19/2001	Roger Moak	Mike Averill		Memo re REM's Principal: The Home Insurance Company Home Management Reports	AC/WP/Supervision/Oversight
452		Art Wilson	Roger Moak		Memo re Office Expenses with hand written note and attachment	AC/WP
453	3/25/2002	cybertat@hotmail.com	Michael Averill	Al Lawrence, Roger Moak	Email re expense allocation recommendations	AC/WP/Supervision/Oversight
454	2/25/2002	Roger Moak	Tim Callahan		Fax re Zurich Management Fee and attachment	AC/WP/Supervision/Oversight



No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
455	1/21/2003	Karl Moller	Roger Moak		Email re Averill Request	AC/WP/Supervision/Oversight
456	1/21/2003	Karl Moller	Roger Moak		Email re Averill Request	AC/WP/Supervision/Oversight
457	2/6/2003	Joel Ross	Michael Averill	T. Kober, R. Moak	Letter re [non-Zurich policy holder]	AC/WP/Supervision/Oversight
458	8/14/2002	Terry Scrivani	Roger Moak	Timothy Callahan, Al Lawrence	Email re Recruiting Expenses and attachment	AC/WP/Supervision/Oversight
459	9/25/2002	Arthur Wilson	Michael Averill	Angela Anglum, Roger Moak	Email re Home Pension Plan	AC/WP/Supervision/Oversight
460	8/27/2002	Timothy Callahan	Roger Moak		Email re Averill	AC/WP/Supervision/Oversight
461	1/22/2002	Roger Moak	Senior Management	C. Callahan, P. Johnson	Memo re REM's Principal: The Home Insurance Company with hand written notes	AC/WP
462	1/21/2002	Roger Moak	Senior Management	C. Callahan, P. Johnson	Memo re: REM's Principal: The Home Insurance Company with hand written notes	AC/WP
463					Draft response to Averill re May G&A Expense Review with hand written notes	AC/WP/Supervision/Oversight
464	4/11/2002	Peter Johnson	Michael Averill	Charles Callahan, Roger Moak	Email re Zurich Results with hand written note	AC/WP/Supervision/Oversight
465	2/27/2002	Terry Scrivani	Roger Moak		Email re Meeting – Mike Averill	AC/WP/Supervision/Oversight
466	2/13/2002	Michael Averill	Roger Moak		Email re [non-Zurich policy holder]	AC/WP/Supervision/Oversight
467	2/13/2002	Roger Moak	Michael Averill		Email re [non-Zurich policy holder]	AC/WP/Supervision/Oversight
468	2/13/2002	Roger Moak	Michael Averill	Jonathan Terrell, Timothy Callahan	Email re [non-Zurich policy holder]	AC/WP/Supervision/Oversight
469	2/13/2002	Roger Moak	Michael Averill	Jonathan Terrell, Timothy Callahan	Email re [non-Zurich policy holder]	AC/WP/Supervision/Oversight
470	2/13/2002	Roger Moak	Michael Averill		Email re [non-Zurich policy holder] and attachment	AC/WP/Supervision/Oversight
471	2/13/2002	Roger Moak	Michael Averill	Farid Bahou	Email re D&O Coverage	AC/WP/Supervision/Oversight
472	2/13/2002	Ray Tatti	Al Lawrence	Michael Averill, Angela Anglum, Roger Moak	Email re Direct Home expenses	AC/WP/Supervision/Oversight
473	2/1/2002	Nellie Gomez	Timothy Callahan, Joseph Campbell, George Mitchell, Karl Moller, Bert Morton, Gary Napolitano, Michael	Charles Callahan, Peter Johnson, Roger Moak	Email re NHID Representative – Michael Averill	AC/WP/Supervision/Oversight

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
474	1/22/2002	Mike Averill	Riney, Jonathan Terrell, Arthur Wilson Roger Moak		Memo re Prior Approval Requests	AC/WP/Supervision/Oversight
475	2/1/2002	Mike Averill	Roger Moak		Memo re Prior Approval Requests	AC/WP/Supervision/Oversight
476	2/1/2002	Roger Moak	Michael Averill		Email re [non-Zurich policy holder]	AC/WP/Supervision/Oversight
477	1/31/2002	Michael Averill	Roger Moak		Email re [non-Zurich policy holder]	AC/WP/Supervision/Oversight
478	1/25/2002	Tom Kober	Angela Anglum	Kevin Kelly, Roger Moak	Email re [non-Zurich policy holder]	AC/WP/Supervision/Oversight
479	1/22/2002	Roger Moak	Michael Averill		Fax re REM's Principal: The Home Insurance Company	AC/WP/Supervision/Oversight
480	1/24/2003	Roger Moak	Karl Moller	Charles Callahan, Peter Johnson	Email re Averill Request	AC/WP/Supervision/Oversight
481	12/27/2001	Roger Moak	Senior Management		Memo re REM's Principal: The Home Insurance Company New Procedure re NHID Supervision	AC/WP/Supervision/Oversight
482	8/29/2002	Roger Moak	Michael Averill		Fax re Home litigation with hand written note	AC/WP/Supervision/Oversight
483	4/16/2002	Michael Averill	Roger Moak		Savings/Dates Project with hand written notes	AC/WP/Supervision/Oversight
484	2/13/2003	Al Lawrence	Timothy Callahan, Charles Callahan, Roger Moak	Maria Croce	Email re Averill Requests	AC/WP/Supervision/Oversight
485	3/7/2003	Jonathan Rosen	Tim McIntyre	George Mitchell, Joel Ross, Joseph Campbell, Paula Maguire, Roger Moak, Timothy Callan, Tom Kober	Email re Vendor payments pre order	AC/WP
486	6/24/2003	Thomas Grogan	CT Corporation System	Michael Averill	Letter re REM's Principal: The Home Insurance Company in Liquidation	AC/WP
487	3/20/2003	Tom Kober	Michael Averill	Kevin Kelly, Barry Gerstein, Roger Moak	Email re Follow-up information	AC/WP
488	4/17/2003	Roger Moak	Thomas Grogan, Michael Averill	Arthur Wilson, Barbara Gierlach, John Trulby	Email re 2002 Annual Statements of Home & USI Re	AC/WP/Supervision/Oversight
489	3/27/2003	Tom [sic]	Roger Moak		Letter re Mississippi Department of Insurance letter	AC/WP
490	4/10/2003	Marry Anne Narkawicz	Roger Moak, Mike Averill		Fax re Letter from State of Mississippi	AC/WP

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
491	4/3/2003	Thomas Grogan	Roger Moak	Michael Nevens	Email re West Virginia – Home and attachment	AC/WP
492	4/18/2003	Joel Ross	Roger Moak		Email re Booking retros	AC/WP
493	5/22/2003	Thomas Grogan	Michael Averill	Roger Moak	Letter re [non-Zurich policy holder]	AC/WP/Supervision/Oversight
494	4/18/2003	Thomas Grogan	Michael Averill	Roger Moak, Art Wilson	Fax re Regulatory Issues and attachment	AC/WP
495	8/2/2001	Roger Moak	Al Lawrence	Timothy Callahan, Michael Riney, Gary Napolitano	Email re O/S Legal Fees	AC/WP
496	8/2/2001	Timothy Callahan	Roger Moak		Email re Ray Tatti request	AC/WP/Supervision/Oversight
497	4/25/2001	Arthur Wilson	Charles Callahan, Peter Johnson, Karl Moller, Roger Moak		Email re KPMG Audit and attachment with hand written notes	AC/WP
498	4/27/2001	Roger Moak	David Nichols		Draft Memo re Licenses of US International Reinsurance Company with hand written note	AC/WP/Supervision/Oversight
499	4/6/2001	Andrew Serell	New Hampshire Department of Insurance	Scott Levitt	Letter re litigation	AC/WP/Supervision/Oversight
500	4/11/2001	Tom Kober	Michael Riney, Roger Moak		Email re PAR 1150 Law Firm Fees in Excess of \$500,000	AC/WP/Supervision/Oversight
501	10/2/2001	Al Lawrence	Ray Tatti	Charles Callahan, Timothy Callahan, Roger Moak, Bert Morton	Email re Expense Allocation Review – Severance Policy	AC/WP/Supervision/Oversight
502	10/2/2001	Al Lawrence	Ray Tatti	Timothy Callahan, Roger Moak, Maria Rosqvist	Email re Expense Review – Facilities Analysis and Activity Exclusions and attachment	AC/WP/Supervision/Oversight
503	10/1/2001	Roger Moak	Al Lawrence		Fax re REM's Policy re allocating severance-related costs between REM and Home	AC/WP/Supervision/Oversight
504	8/28/2001	Al Lawrence	Timothy Callahan, Roger Moak, Bert Morton, Gary Napolitano, Maria Rosqvist		Email re DeVito Review Meeting	AC/WP/Supervision/Oversight
505	8/6/2001	Al Lawrence	Ray Tatti	Timothy Callahan, Roger Moak, Maria Croce	Email re Expense allocation review – Admin Allocations	AC/WP/Supervision/Oversight
506	8/6/2001	Al Lawrence	James B Sweeney	Timothy Callahan, Roger Moak, Maria Croce, Bert Morton	Email re Expense Allocation Review – Severance Questions	AC/WP/Supervision/Oversight
507	8/2/2001	Roger Moak	Al Lawrence	Gary Napolitano, Michael Riney,	Email re Allocation Issues	AC/WP/Supervision/Oversight

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
508	5/15/2001	Peter Johnson	Michael Averill	Timothy Callahan	Draft Letter re The Home Insurance Company with hand written notes	AC/WP/Supervision/Oversight
509	5/15/2001	Peter Johnson	Michael Averill		Draft Letter re The Home Insurance Company with hand written notes	AC/WP/Supervision/Oversight
510	5/1/2001	Al Lawrence	Roger Moak	Timothy Callahan, Arthur Wilson	Email re ALAE Costs Incurred On Behalf of Home	AC/WP
511	4/16/2001	Al Lawrence	Roger Moak		Email re Averill Inquiries	AC/WP/Supervision/Oversight
512	4/12/2001	Michael Averill	Peter Johnson		Letter re Financial Information and attachment	AC/WP/Supervision/Oversight
513	4/12/2001	Tom Kober	Roger Moak	Charles Callahan, Peter Johnson, Michael Riney	Email re NHID Inquiries	AC/WP/Supervision/Oversight
514	4/12/2001	Roger Moak	Timothy Callahan, Thomas Kober, Al Lawrence, Albert Morton, Arthur Wilson	C. Callahan, P. Johnson	Memo re NHID/Mike Averill Inquiries	AC/WP/Supervision/Oversight
515	4/30/2001	Peter Johnson, Charles Callahan	David Nichols		Draft Memo re The Home/Various Information Requests with hand written notes	AC/WP/Supervision/Oversight
516	4/27/2001	Peter Johnson, Charles Callahan	David Nichols		Draft Memo re The Home/Various Information Requests with hand written notes	AC/WP/Supervision/Oversight
517	4/24/2001		Roger Moak		Memo re Relationship Between Expense Allocations and Timekeeping	AC/WP
518	4/27/2001	Roger Moak	David Nichols		Draft Memo re USI Re Licenses with handwritten notes	AC/WP/Supervision/Oversight
519	2/21/2002	Roger Moak	Jeff Liebmann		Fax re Documents for Discussion	AC/WP
520	7/6/2001	Jeremy Isenberg	Roger Moak		Draft letter re Compensation Review	AC/WP
521	6/26/2001	Jeremy Isenberg	Roger Moak		Draft letter re Compensation Review	AC/WP
522	6/28/2001	Peter Johnson	David Nichols		Memo re Department Inquiry	AC/WP
523	6/28/2001	Arthur Wilson	Roger Moak		Draft Questions re Long Term Incentive Plan	AC/WP
524	3/25/2002		Michael Averill		Letter re Home Insurance Questions	AC/WP/Supervision/Oversight
525	11/1/2001	Jonathan Rosen, Art Wilson	David Nichols		Fax re Preparation for Visit	AC/WP/Supervision/Oversight
526	3/6/2001	Pete Bengelsdorf	Art Wilson		Fax re Questions with hand written notes and attachment	AC/WP/Supervision/Oversight
527	3/31/1997	Matt Craig	Roger Moak	C. Callahan, P. Johnson, K. Kelly	Memo re New Hampshire Order of Supervision	AC/WP/Supervision/Oversight
528	4/21/1997		Distribution		Memo re Order of Supervision – March 3, 1997	AC/WP/Supervision/Oversight

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
529	3/19/1997	Roger Moak	Distribution	C. Callahan, P. Johnson	Memo re REM's Principal: The Home Insurance Company	AC/WP
530	3/14/1997	Stephen Doody, Joel Ross	Distribution		Memo re Order of Supervision Compliance Provisions	AC/WP/Supervision/Oversight
531	3/7/1997	Stephen Doody, Joel Ross	Distribution		Memo re Order of Supervision Compliance Provisions	AC/WP/Supervision/Oversight
532	3/4/1997	Rich	Roger Moak		Fax re Order of Supervision	AC/WP/Supervision/Oversight
533	3/4/1997	Peter Johnson, Chuck Callahan	Distribution		Draft Memo re Press Release	AC/WP
534	3/4/1997	Edward Novotney	Home Holdings Inc.	Roger Moak	Memo re Home Insurance Company Placed Under Formal Supervision by the New Hampshire Insurance Department	AC/WP/Supervision/Oversight
535	3/2/1007	Edward Novotney	Home Holdings Inc.		Draft Memo re Home Insurance Company Placed Under Formal Supervision by the New Hampshire Insurance Department	AC/WP/Supervision/Oversight
536	3/4/1997	Tom Kober	Stephen Doody	Roger Moak	Memo re Order of Supervision	AC/WP/Supervision/Oversight
537	3/3/1997	Tom Kober	Stephen Doody	Roger Moak	Memo re Order of Supervision	AC/WP/Supervision/Oversight
538	3/3/1997	Tom Kober	Stephen Doody	Roger Moak	Memo re Order of Supervision	AC/WP/Supervision/Oversight
539	3/5/1997	Roger Moak	Zaid Pdersen, Jan Bruneheim		Fax re Probable questions on New Hampshire's Supervision Order	AC/WP/Supervision/Oversight
540	3/4/1997				Draft Probable questions on New Hampshire's Supervision Order	AC/WP/Supervision/Oversight
541					Draft Probable questions on New Hampshire's Supervision Order with hand written notes	AC/WP/Supervision/Oversight
542	3/4/1997	Roger Moak	Toni Ianniello	Earl Watkins	Fax re Order of Supervision	AC/WP/Supervision/Oversight
543	3/3/1997	Richard Hershman	Roger Moak	Distribution	Fax re Feb. 28, 1997 Letter	AC/WP
544	2/27/1997	Edward Novotny, Martin Skala	Roger Moak		Draft Memo re Probable questions on New Hampshire's Supervision Order with hand written notes	AC/WP/Supervision/Oversight
545	5/27	S. Doddy	I. Engels		Memo re REM's Principal: The Home Insurance Company Prior Approval Procedures	AC/WP/Supervision/Oversight
546	4/24/1997	Stephen Doody	David Nichols		Letter re REM's Principal: The Home Insurance Company Prior Approval Procedures	AC/WP/Supervision/Oversight
547	4/9/1997	Stephen Doody, Joel Ross	Distribution		Memo re Order of Supervision Compliance Provisions-Affiliated Transactions	AC/WP/Supervision/Oversight
548	4/3/1997	Stephen Doody, Joel Ross	Distribution		Memo re Order of Supervision Compliance Provisions	AC/WP/Supervision/Oversight
549	3/28/1997	Stephen Doody, Joel	Distribution		Memo re Order of Supervision Compliance Provisions	AC/WP/Supervision/Oversight

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
		Ross				ision/Oversight
550		Roger Moak	Distribution	Toni Ann Hinch, Gordon Hwang, Jonathan Rosen	Memo re Order of Supervision	AC/WP/Supervision/Oversight
551	3/3/1997	Richard Miller	Iris Engels		Fax re Order of Supervision	AC/WP/Supervision/Oversight
552	5/23/1995	Theodore Chen	Angela Anglum		Fax re Letter from California Insurance Department	AC/WP/Supervision/Oversight
553	3/22/1995	Alexander Dye, Joseph Hissong	John Battles, Maxine Blake, Angela Anglum, Robert Sullivan, Chiahua Pan, Rudy Dimmling		Fax re agenda for meeting	AC/WP
554	2/23/2000	Arthur Wilson	Iris Engels		Draft Letter re Annual Statement Representations	AC/WP
555	6/28/1995		Roger Moak		Memo re Apportionment of Expense Agreement with hand written note	AC/WP
556	1/19/2001	Roger Moak	Ms. May		Letter re Apt. Lease Renewal	AC/WP
557	2/4/1998	Roger Moak	Mike Nevens		Fax re 1995 Contract	AC/WP
558	10/4/1995	Roger Moak	David Nichols	Commissioner Dupuis, P. Johnson, C. Callahan	Memo re California Rollback Liability	AC/WP/Supervision/Oversight
559	8/16/1995	Joseph Hissong	Roger Moak	Leon Roday	Memo re Consulting Agreement	AC/WP
560	4/15/2003	Thomas Grogan	Roger Moak	Joel Ross	Email re Introductory wording – Home in Rehabilitation	AC/WP
561	1/7/2003	Richard Behar	Roger Moak		E-mail re: Quotes	AC/WP
562	1/7/2003	Roger Moak	Richard Behar		Fax re: the Home Insurance Company	AC/WP
563	1/7/2003	Richard Behar	Roger Moak		E-mail re: Quotes	AC/WP
564	1/4/2003	Richard Behar	Roger Moak		E-mail re: Background information with hand written notes	AC/WP
565	4/1/2003				Prior Approval Request	Supervision/Oversight
566	4/9/2003	Tim McIntyre	Roger Moak,	Timothy Callahan	E-mail re: Chicago – Assignment and Assumption of Lease	AC/WP
567	4/9/2003	Tim McIntyre	Roger Moak	Timothy Callahan	E-mail re: Chicago -- Assignment and Assumption of Lease	AC/WP
568	3/25/2003	Roger Moak	P. Rogers, Peter Bengelsdorf	Angela Anglum, Jonathan Rosen, Joel Ross	E-mail re: The Home Insurance Company in Rehabilitation	AC/WP/Supervision/Oversight
569	3/17/2003	Pete Bengelsdorf	Nicole Grzelak	Paula Rogers, Steve Ferman, John Cross, Roger Moak	Letter re: The Home Insurance Company in Rehabilitation; Delivery of OSR Note and Acknowledgement of Payment	AC/WP/Supervision/Oversight
570	3/11/2003	Steve Germain	Roger Moke		E-mail re: Note Payoff	AC/WP
571	3/14/2003	Nicole Grzelak	Peter Bengelsdorf	Angela Anglum,	E-mail re: Delivery of OSR Note & Acknowledgement	AC/WP/Supervision/Oversight

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
						ision/Oversight
572	3/11/2003	Steve Germain	Roger Moak	Roger Moak	of Payment	AC/WP
573	4/16/2003	Roger Moak	Jackie Johnson	John Cross	E-mail re: Note Payoff	AC/WP
574	3/27/2003	Tim McIntyre	Joel Ross		Fax re Third Amendment to Services Agreement	AC/WP
575	3/28/2003	Tim McIntyre	Roger Moak, Joel Ross		Email re Third Amendment to Services Agreement	AC/WP
576	3/28/2003	Roger Moak	Charles Callahan, Peter Johnson, Michael Riney	Tim McIntyre, Joel Ross	Email re Third Amendment to Services Agreement	AC/WP
577	3/31/2003	Tim McIntyre	Roger Moak, Joel Ross, Fran Semaya		Email re Amendment to SA	AC/WP
578	3/31/2003	Tim McIntyre	Fran Semaya		Email re Amendment to SA	AC/WP
579	3/31/2003	Roger Moak	Tim McIntyre		Email re Amendment to SA	AC/WP
580	3/31/2003	Tim McIntyre	Roger Moak		Email re Amendment to SA	AC/WP
581	2/25/2003				Packet of documents from 2/25/2003 Meeting with NHID stamped Attorney Work Product	AC/WP/Supervision/Oversight
582	2/27/2003	Roger Moak	Michael Averill		Fax re Draft Letter requesting waiver of accounting rules and documentary background	AC/WP/Supervision/Oversight
583	3/27/2003	Joel Ross	Elaine Cates	Tim McIntyre	Email re Third Amendment to Services Agreement	AC/WP
584	4/2/2003	Tim McIntyre	Michael Foley	Tim Callahan	Email re Amendment to Zurich Guaranty	AC/WP
585	4/4/2003	Tim McIntyre	Bruce Lerner	Timothy Callahan	Email re Various Transfers of Leases from Home to REM	AC/WP
586	4/8/2003	Roger Moak	Martin Gross		Email re NHID Proposal re Indemnification and Expense Reimbursement	AC/WP/Supervision/Oversight
587	4/8/2003	Tim McIntyre	Michael Foley		Email re Revision to Guaranty – 2nd Request	AC/WP
588	4/9/2003	Tim McIntyre	Roger Moak	Timothy Callahan	Email re Chicago – Assignment and Assumption of Lease	AC/WP
589	4/10/2003	Roger Moak	Joel Ross, Tim McIntyre	Tom Kober	Email re revised draft amendment to services agreement	AC/WP
590	4/11/2003	Tim McIntyre	Roger Moak, Joel Ross		Email re Discussion Draft – Contingency Agreement	AC/WP
591	4/15/2003	Michael Foley	Tim McIntyre		Email re Amendment to Guaranty	AC/WP
592	3/27/2003	Joel Ross	Elaine Cates	Tim McIntyre	Email re Third Amendment to Services Agreement	AC/WP
593	4/16/2003	Tim McIntyre	Michael Foley		Email re Amendment to Guaranty	AC/WP
594	4/17/2003	Roger Moak	Tim Callahan, Peter Johnson, Michael Riney, Timothy Callahan		Email re 3rd Amendment to Services Agreement	AC/WP
595	4/21/2003	Michael Foley	Tim McIntyre		Email re Amendment to Guaranty	AC/WP
596	3/27/2003	Tim McIntyre	Joel Ross		Email re Third Amendment to Services Agreement	AC/WP
597	4/29/2003	Roger Moak	Tim McIntyre	Michael Riney	Email re Revised Services Agreement	AC/WP
598	5/1/2003	Betsy Borque	Timothy Callahan	Tim McIntyre	Email re Extract – Home-REM Services Agreement	AC/WP

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
599	3/28/2003	Tim McIntyre	Roger Moak	Joel Ross	Email re Third Amendment to Services Agreement	AC/W/P
600	5/1/2003	Betsy Bourque	Al Lawrence	Timothy Callahan, Tim McIntyre	Email re Extract – Home-REM Services Agreement	AC/W/P
601	5/1/2003	Tim McIntyre	Charles Callahan, Timothy Callahan, Roger Moak		Email re Home-REM Services Agreement	AC/W/P
602	5/2/2003	Tim McIntyre	Peter Johnson, Charles Callahan, Timothy Callahan, Michael Riney, Roger Moak, Joel Ross		Email re Services Agreement Draft	AC/W/P
603	5/2/2003	Tim McIntyre	Fran Semaya, Cozen Attorney		Email re Home-REM Services Agreement	AC/W/P
604	5/2/2003	Al Lawrence	Tim McIntyre		Email re Development of Rates and Services Agreement	AC/W/P
605	3/28/2003	Tim McIntyre	Roger Moak, Joel Ross		Email re Third Amendment to Services Agreement	AC/W/P
606	3/28/2003	Tim McIntyre	Roger Moak, Joel Ross		Email re Third Amendment to Services Agreement	AC/W/P
607	3/28/2003	Tim McIntyre	Roger Moak, Joel Ross		Email re Third Amendment to Services Agreement	AC/W/P
608	3/20/2003		Tim McIntyre		Fax re REM's Principal: The Home Insurance Company	AC/W/P
609	4/15/2003		Tim McIntyre		Fax re Amendment to Guaranty	AC/W/P
610	4/15/2003	Roger Moak	Tim McIntyre		Fax re Third Amendment to Services Agreement	AC/W/P
611	3/23/2003	Fran Semaya	Tim McIntyre		Fax re Third Amendment to Services Agreement	AC/W/P
612	3/28/2003		Tim McIntyre		Fax re Third Amendment to Services Agreement	AC/W/P
613	3/28/2003		Tim McIntyre		Fax re Third Amendment to Services Agreement	AC/W/P
614	3/28/2003		Tim McIntyre		Fax re Third Amendment to Services Agreement	AC/W/P
615	3/28/2003		Tim McIntyre		Fax re Third Amendment to Services Agreement	AC/W/P
616	3/31/2003	Mike Huber	Tim McIntyre		Fax re REM Hold Harmless/Indemnification Letter	AC/W/P
617	3/31/2003		Tim McIntyre		Fax re REM Hold Harmless/Indemnification Letter	AC/W/P
618	3/31/2003	Roger Moak	Tim McIntyre		Fax re Third Amendment to Services Agreement	AC/W/P
619	5/2/2003	Roger Moak	Charles Callahan, Tim Callahan	Peter Johnson, Michael Riney, Timothy Callahan, Tim McIntyre, Joel Ross	Email re Ltr – Bengelsdorf re Amendm Svs Agr	AC/W/P
620	5/5/2003	Betsy Bourque	Roger Moak, Tim McIntyre, Joel Ross		Email re Revised Services Agreement	AC/W/P
621	7/11/2003	Roger Moak	Tim McIntyre		Email re Final Drafts Next Week	AC/W/P
622	7/14/2003	Peter Johnson	Timothy Callahan	Tim McIntyre, Joel Ross	Email re The Home – REM draft agreements	AC/W/P



No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
623	7/15/2003	Rackemann Attorney	Tim McIntyre	Angela Anglum, Rackemann Attorney, Attorneys from NHID	Email re The Home – REM draft agreements	AC/WP/Supervision/Oversight
624	7/15/2003	Tim McIntyre	Timothy Callahan, Joel Ross		Email re The Home -- REM draft agreements	AC/WP
625	7/15/2003	Peter Johnson	Timothy Callahan, Tim McIntyre, Joel Ross		Email re The Home -- REM Agreements	AC/WP
626	7/15/2003	Tim McIntyre	Martin Gross, Jeff Liebmann	Roger Moak	Email re The Home – REM Agreements	AC/WP
627	7/15/2003	Tim McIntyre	Fran Semaya		Email re The Home – REM Agreements	AC/WP
628	5/5/2003	Betsy Bourque	Roger Moak, Tim McIntyre, Joel Ross		Email re Services Agreement	AC/WP
629	5/5/2003	Tim McIntyre	Fran Semaya		Email re Services Agreement	AC/WP
630	5/6/2003	Fran Semaya	Tim McIntyre		Email re Services Agreement	AC/WP
631	5/7/2003	Tim McIntyre	Fran Semaya	Joel Ross	Email re REM Signing Agreements for Home	AC/WP
632	5/7/2003	Tim McIntyre	Fran Semaya	Joel Ross	Email re REM Signing Agreements for Home	AC/WP
633	5/7/2003	Fran Semaya	Tim McIntyre		Email re REM Signing Agreements for Home	AC/WP
634	5/8/2003	Tim McIntyre	Fran Semaya	Roger Moak	Email re NHID	AC/WP
635	5/8/2003	Tim McIntyre	Martin Gross	Roger Moak	Email re REM Services Agreement	AC/WP
636	5/8/2003	Tim McIntyre	Jeff Liebmann	Roger Moak	Email re Home-REM Services Agreement	AC/WP
637	5/9/2003	Roger Moak	Tim McIntyre, Joel Ross, Martin Gross, Jeff Liebmann		Email re REM/Liquidator Services Agreement	AC/WP
638	5/15/2003	Tim McIntyre	Timothy Callahan		Email re REM Services Agreement	AC/WP
639	5/15/2003	Peter Johnson, Charles Callahan	Rackemann Attorney, Attorneys from NHID		Email re REM Services Agreement	AC/WP/Supervision/Oversight
640	5/15/2003	Roger Moak	Tim McIntyre, Joel Ross		Email re Services Agreement	AC/WP
641	5/4/2003	Tim McIntyre	Peter Johnson, Charles Callahan, Timothy Callahan, Michael Riney, Roger Moak, Joel Ross		Email re Services Agreement	AC/WP
642	5/16/2003	Al Lawrence	Timothy Callahan	Maria Croce, Tim McIntyre	Email re Services Agreement	AC/WP
643	5/19/2003	Joel Ross	Tim McIntyre		Email re Draft Services Agreement	AC/WP
644	5/20/2003	Roger Moak	Rackemann Attorneys, Peter	Nellie Gomez	Email re Receiver/REM Services Agreement	AC/WP

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
645	5/21/2003	Roger Moak	Bengelsdorf, NHDOJ Attorney, Tim McIntyre, Peter Johnson, Charles Callahan	Peter Bengelsdorf, Attorney from NHID	Email re Receiver/REM Services Agreement	AC/WP/Supervision/Oversight
646	5/23/2003	Tim McIntyre	Rackemann Attorneys		Email re REM Services Agreement	AC/WP
647	5/23/2003	Tim McIntyre	Timothy Callahan		Email re REM Services Agreement	AC/WP
648	5/23/2003	Tim McIntyre	Martin Gross		Email re REM Services Agreement	AC/WP
649	5/23/2003	Martin Gross	Martin Gross		Email re REM Services Agreement	AC/WP
650	5/4/2003	Tim McIntyre	Tim McIntyre, Martin Gross, Martin Honigsberg		Email re Services Agreement	AC/WP
651	5/27/2003	Tim McIntyre	Fran Semaya		Email re REM Services Agreement	AC/WP
652	5/29/2003	Tim McIntyre	Martin Gross, Martin Honigsberg		Email re Services Agreement	AC/WP
653	5/30/2003	Tim McIntyre	Peter Johnson, Charles Callahan, Timothy Callahan, Michael Riney, Joseph Campbell, Roger Moak, Al Lawrence, Joel Ross		Email re Services Agreement	AC/WP
654	5/30/2003	Tim McIntyre	Peter Johnson, Charles Callahan, Timothy Callahan, Michael Riney, Joseph Campbell, Roger Moak, Joel Ross		Email re Services Agreement	AC/WP
655	5/30/2003	Tim McIntyre	Martin Gross, Martin Honigsberg	Roger Moak	Email re REM Services Agreement	AC/WP
656	6/2/2003	Tim McIntyre	Fran Semaya	Roger Moak	Email re Services Agreement	AC/WP
657	6/2/2003	Peter Johnson	Peter Johnson, Charles Callahan, Joseph Campbell, Roger Moak, Michael Riney, Joel Ross	Charles Callahan, Joel Ross, Joseph Campbell, Michael Riney, Roger Moak,	Email re Services Agreement	AC/WP

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
658	6/2/2003	Tim McIntyre	Fran Semaya	Timothy Callahan	Email re Services Agreement	AC/WP
659	5/4/2003	Fran Semaya	Tim McIntyre		Email re Services Agreement	AC/WP
660	6/3/2003	Tim McIntyre	Peter Johnson, Charles Callahan, Timothy Callahan, Michael Riney, Roger Moak, Joseph Campbell, Joel Ross		Email re Services Agreement	AC/WP
661	6/3/2003	Tim McIntyre	Martin Gross		Email re Services Agreement	AC/WP
662	6/3/2003	Tim McIntyre	Fran Semaya		Email re Services Agreement	AC/WP
663	6/3/2003	Fran Semaya	Tim McIntyre		Email re Services Agreement	AC/WP
664	6/3/2003	Tim McIntyre	Roger Moak, Joel Ross		Email re Services Agreement	AC/WP
665	6/17/2003	Roger Moak	Charles Callahan, Peter Johnson	Tim McIntyre, Joel Ross	Email re Services Agreement	AC/WP
666	6/17/2003	Roger Moak	Charles Callahan, Peter Johnson, Michael Riney, Timothy Callahan	Joel Ross, Tim McIntyre	Email re Revision of Services Agreement	AC/WP
667	6/19/2003	Tim McIntyre	Charles Callahan	Roger Moak	Email re Services Agreement – Rehabilitators Redline showing changes to REM original	AC/WP
668	6/20/2003	Charles Callahan	Peter Johnson, Roger Moak, Michael Riney, Timothy Callahan, Tim McIntyre		Email re Draft Term Sheet	AC/WP
669	6/20/2003	Roger Moak	Tim McIntyre, Joel Ross		Email re Draft Term Sheet	AC/WP
670	5/5/2003	Betsy Bourque	Roger Moak, Tim McIntyre, Joel Ross		Email re Services Agreement	AC/WP
671	6/20/2003	Roger Moak	Joel Ross, Tim McIntyre		Email re Letter to NHID	AC/WP
672	6/24/2003	Tim McIntyre	Timothy Callahan		Email re Assignability of Zurich Outsourcing Agreement	AC/WP
673	6/25/2003	Charles Callahan	Tim McIntyre		Email re Services Agreement	AC/WP
674	6/25/2003	Tim McIntyre	Peter Johnson, Charles Callahan		Email re Term Sheet	AC/WP
675	6/25/2003	Tim McIntyre	Peter Johnson, Charles Callahan		Email re Term Sheet	AC/WP
676	6/25/2003	Roger Moak	Tim McIntyre		Email re Term Sheet	AC/WP
677	6/26/2003	Peter Johnson	Charles Callahan, Roger Moak,		Email re Home – REM Transitional Services Agreement	AC/WP

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
678	6/26/2003	Roger Moak	Michael Riney, Timothy Callahan, Tim McIntyre		Email re Home -- REM Transitional Services Agreement	AC/WP
679	6/28/2003	Tim McIntyre	Timothy Callahan		Email re Side Letter	AC/WP
680	6/28/2003	Timothy Callahan	Tim McIntyre		Email re Side Letter	AC/WP
681	5/5/2003	Betsy Bourque	Roger Moak, Tim McIntyre, Joel Ross		Email re Revised Services Agreement	AC/WP
682	6/28/2003	Tim McIntyre	Timothy Callahan		Email re Side Letter	AC/WP
683	6/29/2003	Tim McIntyre	Timothy Callahan		Email re Letter Agreement revised	AC/WP
684	6/29/2003	Tim McIntyre	Peter Johnson, Charles Callahan, Timothy Callahan, Roger Moak		Email re Draft Letter Agreement	AC/WP
685	7/1/2003	Tim McIntyre	Bruce Lerner		Email re REM Consent to Assignment	AC/WP
686	7/2/2003	Roger Moak	Tim McIntyre, Fran Semaya		Email re draft contracts	AC/WP
687	7/2/2003	Tim McIntyre	Roger Moak		Email re draft contracts	AC/WP
688	7/3/2003	Roger Moak	Timothy Callahan, Tim McIntyre, Joel Ross, Fran Semaya		Email re Draft Transition and Services Agreement	AC/WP
689	7/3/2003	Joseph Campbell	Tim McIntyre		Email re Transfer of Assets	AC/WP
690	7/3/2003	Tim McIntyre	Michael Riney		Email re Draft Transition and Services Agreement	AC/WP
691	7/6/2003	Tim McIntyre	Peter Johnson, Charles Callahan, Timothy Callahan, Michael Riney, Roger Moak, Joel Ross		Email re Services Agreement	AC/WP
692	5/5/2003	Fran Semaya	Tim McIntyre		Email re Services Agreement	AC/WP
693	7/7/2003	Tim McIntyre	Joseph Campbell	Michael Foley	Email re Services Agreement	AC/WP
694	7/7/2003	Tim McIntyre	Peter Johnson, Charles Callahan, Timothy Callahan, Joseph Campbell, Michael Riney, Roger Moak, Joel Ross		Email re Revised Agreements	AC/WP
695	7/7/2003	Roger Moak	Charles Callahan, Tim Callahan	Peter Johnson, Timothy Callahan,	Email re REM Employees	AC/WP

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
696	7/8/2003	Tim McIntyre	Peter Johnson, Charles Callahan, Roger Moak	Joseph Campbell, Tim McIntyre, Joel Ross	Email re Transition Services; Asset Transfer Agreements	AC/WP
697	7/8/2003	Tim McIntyre	Joel Ross		Email re Transition Services; Asset Transfer Agreements	AC/WP
698	7/8/2003	Roger Moak	Tim McIntyre, Timothy Callahan, Joel Ross		Email re REM Employees	AC/WP
699	7/8/2003	Fran Semaya	Roger Moak	Tim McIntyre, Joel Ross	Email re Revised Agreements	AC/WP
700	7/9/2003	Roger Moak	Tim McIntyre, Joel Ross		Email re Liquidator Contracts	AC/WP
701	7/10/2003	Roger Moak	Tim McIntyre, Joel Ross, Martin Gross, Jeff Liebmann		Email re Services and Asset Transfer Agreements	AC/WP
702	5/5/2003	Betsy Bourque	Roger Moak, Joel Ross, Tim McIntyre		Revised Services Agreement	AC/WP
703	7/10/2003	Tim McIntyre	Timothy Callahan		Email re Services Agreement	AC/WP
704	7/10/2003	Roger Moak	Tim McIntyre, Joel Ross		Email re Services Agreement	AC/WP
705	7/10/2003	Tim McIntyre	Betsy Bourque		Email re Draft Agreements	AC/WP
706	7/10/2003	Tim McIntyre	Betsy Bourque		Email re Agreements	AC/WP
707	7/11/2003	Roger Moak	Tim McIntyre, Joel Ross, Timothy Callahan		Email re Draft Agreements	AC/WP
708	7/11/2003	Tim McIntyre	Rackemann Attorneys	Roger Moak, Charles Callahan, Timothy Callahan	Email re Asset Purchase Agreement Section 2(a)	AC/WP
709	7/11/2003	Tim McIntyre	Joel Ross		Asset Purchase Agreement Section 2(a)	AC/WP
710	7/11/2003	Roger Moak	Martin Gross, Jeff Liebmann	Tim McIntyre, Joel Ross	Email re draft contracts	AC/WP
711	7/11/2003	Roger Moak	Fran Semaya	Tim McIntyre	Email re Draft Agreements	AC/WP
712					Prior Approval Requests	Supervision/Oversight
713	3/20/2003	Roger Moak	Tim McIntyre		Fax re REM's Principal: The Home Insurance Company	AC/WP
714	4/25/2003	Tim McIntyre	Timothy Callahan		Email re Contingency Services Agreement	AC/WP
715	5/3/2003		Tim McIntyre		Fax re Services Agreement	AC/WP
716	5/7/2003	Roger Moak	Tim McIntyre		Fax re REM/Home Services Agreement	AC/WP
717	3/31/2003	Mike Huber	Tim McIntyre		Fax re REM Hold Harmless/Indemnification letter	AC/WP
718	3/31/2003		Tim McIntyre		Fax re REM Hold Harmless/Indemnification letter	AC/WP

No.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
719	5/7/2003	Tim McIntyre	Timothy Callahan, Nelli Gomez		Email re Bill of Sale	AC/WP
720	5/9/2003		Tim McIntyre		Fax re Assignment of Lease Agreement	AC/WP
721	5/15/2003	Winnie Moy	Roger Moak, Tim McIntyre	Peter Johnson	Email re REM Services Agreement – Rehabilitator Draft	AC/WP
722	5/19/2003	Fran Semaya	Tim McIntyre		Fax re Services Agreement	AC/WP
723	6/2/2003	Fran Semaya	Tim McIntyre		Fax re Services Agreement	AC/WP
724	6/20/2003	Roger Moak	Tim McIntyre		Fax re Payment for transition services from REM to Home Letter	AC/WP
725	6/20/2003	Roger Moak	Tim McIntyre		Fax re Transition Services Letter	AC/WP
726	7/22/2003		Tim McIntyre		Fax re Services Agreement	AC/WP
727	3/23/2003	Fran Semaya	Tim McIntyre		Fax re Third Amendment to Services Agreement	AC/WP
728	3/25/2003	Tim McIntyre	Timothy Callahan		Email re Bill of Sale	AC/WP
729	3/28/2003		Tim McIntyre		Fax re Third Amendment to Services Agreement	AC/WP
730	3/28/2003		Tim McIntyre		Fax re Third Amendment to Services Agreement	AC/WP
731	3/28/2003		Tim McIntyre		Fax re Third Amendment to Services Agreement	AC/WP
732	11/4/1996	Steven Germain	Roger Moak		Fax re Security Holders Agreement	AC/WP
733	5/8/2003	Peter Johnson	Charles Callahan, Roger Moak, Michael Riney, Timothy Callahan		Email re Home Insurance Company – Draft New Hampshire Press Release and Pleadings	AC/WP//Supervision/Oversight
734	5/7/2003	Michael Riney	Peter Johnson, Charles Callahan, Roger Moak		Email re Draft Press Release	AC/WP
735	5/7/2003	Michael Riney	Peter Johnson, Charles Callahan, Roger Moak		Email re Draft Press Release	AC/WP
736	4/23/2003	Arthur Wilson	Roger Moak		Email re OSR/Home Promissory Note	AC/WP
737	4/18/2003	Michael Averill	Roger Moak	Arthur Wilson, Barbara Gierlach, John Trulby, Thomas Grogan	Email re 2002 Annual Statements of Home & USI Re	AC/WP/Supervision/Oversight
738	4/18/2003	Fran Semaya	Roger Moak		Email re 3 <sup>rd</sup> Amendment to Services Agreement	AC/WP
739	4/17/2003	Martin Gross	Roger Moak	Martin Gross	Email re 3 <sup>rd</sup> Amendment to Services Agreement	AC/WP
740	4/17/2003	Roger Moak	Thomas Grogan, Michael Averill	Arthur Wilson, Barbara Gierlach, John Trulby	Email re 2002 Annual Statements of Home & USI Re	AC/WP

**FULLER-AUSTIN DOCUMENT SUBPOENA**

**REDACTION LOG**

Unless set forth below, the redactions from Risk Enterprise Management’s document production were of non-Zurich policy holder names and specific information concerning those policy holders. The four documents listed below are the redactions that were not based on disclosure of non-Zurich policy holders.

“Oversight” refers to the statutory confidentiality provided by RSA 400-A:37 and RSA 401-B:7 during this period of the New Hampshire Insurance Department’s oversight of The Home Insurance Company (“The Home”) pursuant to the June 9, 1995 Consent Order; “Supervision” refers to the statutory confidentiality provided by RSA 400-A:37, RSA 401-B:7, and RSA 400-F:8 during the period of the New Hampshire Insurance Department’s supervision of The Home pursuant to the March 3, 1997 Order of Supervision

<b>REM BEG DOC#</b>	<b>REM END DOC#</b>	<b>DOC DATE</b>	<b>FROM/AUTHOR</b>	<b>TO/RECIPIENT</b>	<b>CC</b>	<b>DOC DESCRIPTION</b>	<b>PRIVILEGE</b>
REM016485	REM016494	6/3/2003	Tom Kober	Michael Averill	Peter Bengelsdorf, Joanne Mullen, Michael Riney	Email re Allegient Services, Inc. and attachment. Redaction of attorney-client privileged information.	Supervision/ Oversight
REM016497	REM016504	5/21/2003				Joint conference minutes Home Ins. Company Liquidator and NCIGF Coordinating Committee. Redaction of attorney-client privileged information.	Supervision/ Oversight
REM020118	REM020126	Undated				Home Insurance Company G&A Expense Variance Analysis Twelve Months Ending December 31, 2001. Redaction of attorney-client privileged information.	Settlement Discussion
REM020261	REM020271	Undated				Home Insurance Company G&A Expense Variance Analysis Twelve Months Ending December 31, 2001. Redaction of attorney-client privileged information.	Settlement Discussion

**FULLER-AUSTIN DOCUMENT SUBPOENA**

**HOME PRIVILEGE LOG**

“Oversight” refers to the statutory confidentiality provided by RSA 400-A:37 and RSA 401-B:7 during this period of the New Hampshire Insurance Department’s oversight of The Home Insurance Company (“The Home”) pursuant to the June 9, 1995 Consent Order; “Supervision” refers to the statutory confidentiality provided by RSA 400-A:37, RSA 401-B:7, and RSA 400-F:8 during the period of the New Hampshire Insurance Department’s supervision of The Home pursuant to the March 3, 1997 Order of Supervision

<b>NO.</b>	<b>DOC DATE</b>	<b>FROM/AUTHOR</b>	<b>TO/RECIPIENT</b>	<b>CC</b>	<b>DOC DESCRIPTION</b>	<b>PRIVILEGE</b>
1	8/27/1996	Rudy Dimmling	Richard Hershman	Charles Callahan, Peter Johnson, Alan Lawrence, David Nichols, and Joseph DeVito	Memo with handwritten notations re Comparison of Forecasted Operating Expenses and attachment.	Oversight
2	1996	{Rudy Dimmling}			Presentation to New Hampshire Insurance Department - Runoff Status/Analysis of The Home with handwritten notations by Rudy Dimmling and Al Lawrence.	Oversight
3	8/23/2000	Alan Lawrence	Davis Tharayil	Timothy Callahan, Joseph Campbell, Alan Lawrence	E-mail with handwritten notations re DeVito request.	Supervision/ Oversight
4	11/10/1999	Alan Lawrence	David Nichols, Ray Tatti	Peter Bengelsdorf	Memo re The Home G&A Expenses - September 30, 1999.	Supervision/ Oversight
5	Undated	Alan Lawrence			Schedule of New Hampshire Expenses March 2001 with handwritten notations by Al Lawrence.	Supervision/ Oversight
6	3/13/2001	Alan Lawrence	David Nichols	Timothy Callahan, Charles Callahan, Maria Rosqvist Croce, Alan Lawrence	E-mail with handwritten notations re 2001 New Hampshire Final Budget.	Supervision/ Oversight
7	3/13/2001	Alan Lawrence	James Sweeney		E-mail re 2001 New Hampshire Budget.	Supervision/ Oversight
8	9/8/2000	Joseph Campbell	Ray Tatti, Angela Anglum	Roger Moak, Michael Foley, Davis Tharayil, James Sweeney, Joseph DeVito, David Nichols, Charles Callahan,	Memo with handwritten notations by Al Lawrence and attachments re Responses to Questions Dated June 20 (Attached) (see #32) - Prior Approval Request.	Supervision/ Oversight



NO.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
9	06/20/2000	Angela Anglum, Ray Tatti	Joseph Campbell	Timothy Callahan, Timothy McIntyre	Memo with handwritten notations re Prior Approval Request. (See #31.)	Supervision/ Oversight
10	Undated	{Financial Services Department}	{DeVito Consulting}		Redaction to The Home Cost Allocations Report - June 2002. (See #s 50 & 58.)	Supervision/ Oversight
11	10/19/1999	{Financial Services Department}			Document re The Home's 2000 Budget re G&A Expenses	Supervision/ Oversight
12	10/13/1999	{Financial Services Department}			Document re The Home's 2000 Budget re G&A Expenses revised 10/07/1999.	Supervision/ Oversight
13	Undated	{Financial Services Department}			Document re The Home's 2000 Budget re G&A Expenses revised 10/07/1999 with handwritten notations by Al Lawrence and others.	Supervision/ Oversight
14	10/8/1999	{Financial Services Department}			Documents re The Home Headcount and Salary Expense Comparison with handwritten notations by Al Lawrence.	Supervision/ Oversight
15	Undated	{IT Department}			Document re Technology Services questions and answers.	Supervision/ Oversight
16	2/14/2000	Alan Lawrence	Ray Tatti	Charles Callahan, Timothy Callahan, Peter Johnson, Alan Lawrence	E-mail re 2000 Home Budget Questions.	Supervision/ Oversight
17	Undated	{Financial Services Department}	{DeVito Consulting}		Expense Allocation Methodology report.	Supervision/ Oversight
18	Undated	{Financial Services Department}			Draft report with handwritten notations by Al Lawrence and attachment re Expense Allocations.	Supervision/ Oversight
19	Undated	{Financial Services Department}			Draft report with handwritten notations and attachment re Expense Allocations.	Supervision/ Oversight
20	12/1/1998	Alan Lawrence	Ray Tatti	Timothy Callahan, Marie Rosqvist Croce, Bruce Lerner	Memo and attachment re Facilities Analysis. (See #90.)	Supervision/ Oversight
21	9/9/2002	Alan Lawrence	Michael Averill	Timothy Callahan, Roger Moak, Alan Lawrence	E-mail re Requests - Visit of August 28th.	Supervision/ Oversight
22	9/6/2002	Alan Lawrence	Roger Moak		E-mail with handwritten notations by Al Lawrence and attached schedule re Averill request - Historical Expense Variances.	Supervision/ Oversight and ACP

NO.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
23	7/24/2002	Alan Lawrence	Michael Averill		E-mail re time allocations.	Supervision/ Oversight
24	7/12/2002	Michael Averill	Alan Lawrence		E-mail re time allocations.	Supervision/ Oversight
25	5/31/2002	Michael Averill	Alan Lawrence		E-mail with handwritten notations and attachment re REM clients.	Supervision/ Oversight
26	9/10/2002	Alan Lawrence	Alan Lawrence		E-mail (to file) and attached exhibit re Outplacement Services.	Supervision/ Oversight
27	Undated	{Financial Services Department}	{DeVito Consulting}		The Home Cost Allocations Report - June 2002. (See #s 33 & 58.)	Supervision/ Oversight
28	3/20/2002	Alan Lawrence	Ray Tatti	Timothy Callahan, Roger Moak	E-mail and attached report re REM Responses to DeVito Consulting Draft Report - March 2002.	Supervision/ Oversight
29	3/18/2002	Alan Lawrence	Roger Moak	Timothy Callahan	E-mail (in duplicate) and attached marked draft report re REM Responses to DeVito Consulting Draft Report - March 2002.	Supervision/ Oversight and ACP
30	Undated	{Financial Services Department}	Ray Tatti		Report re REM Responses to DeVito Consulting Draft Report - October 2001 with handwritten notations by AI Lawrence. (Duplicate - See #94.)	Supervision/ Oversight
31	2/27/2002	Alan Lawrence	Michael Averill		Memo re Zurich Management Fee.	Supervision/ Oversight
32	2/13/2003	Alan Lawrence	Timothy Callahan, Charles Callahan, Roger Moak	Marie Rosqvist Croce	E-mail and attached schedule re Averill Requests.	Supervision/ Oversight
33	2/20/2003	Alan Lawrence	Michael Averill	Timothy Callahan, Roger Moak	E-mail and attachment re The Home's G&A Expense Variances.	Supervision/ Oversight
34	Undated	Financial Services Department	{NHID / DeVito Consulting}		Report with handwritten notations by AI Lawrence re Expense Allocations - May 2001 (in duplicate).	Supervision/ Oversight
35	Undated	{Financial Services Department}	{DeVito Consulting}		The Home Cost Allocations Report - June 2002. (See #s 33 & 50.)	Supervision/ Oversight
36	2/28/2000	Financial Services Department	{DeVito Consulting}		Report re Philadelphia Field Office Expense Allocation Review - February 28, 2000 with handwritten notations by AI Lawrence. (Triplicate Copies - in part.)	Supervision/ Oversight
37	Undated	{Rudy Dimmling}			Document re Financial Analysis of The Home with handwritten notations.	Supervision/ Oversight
38	12/1/1999	{Rudy Dimmling}	{Board of Directors of The Home, NHID}		Document re The Home's Composition of Expenses and Staff Count trending.	Supervision/ Oversight
39	2/25/2000 (pages 5 - 7)	Arthur Wilson	{Board of Directors of The Home, NHID}		Report re 1999 Financial Analysis of The Home.	Supervision/ Oversight
40	2/21/2002 (pages 3 - 4)	Arthur Wilson	{Board of Directors of The Home, NHID}		Report re 2001 Financial Analysis of The Home.	Supervision/ Oversight
41	Undated	Rudy Dimmling	{Board of Directors}		Document re Home Insurance Economic Model.	Supervision/ Oversight

NO.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
			of The Home, NHID}			Oversight
42	Undated	{Rudy Dimmling}			Document re The Home's Cash Flow Projections.	Supervision/ Oversight
43	10/31/1996	Stephen Doody	Charles Callahan	Roger Moak	Memo Re: Phoenix and Form A Hearing transcript.	ACP
44	5/30/1996	Pat Grannan	Thomas Burke	David Nichols	Memo and attachment re Home Insurance Companies.	Oversight
45	5/30/1996	Thomas Burke	Terry Boyer		Letter with handwritten notations re NAIC Financial Analysis Working Group Inquiry re The Home.	Oversight
46	10/31/1996	Stephen Doody	Charles Callahan	Roger Moak	Memo Re: Phoenix and Form A Hearing transcript.	ACP
47	1996	{Rudy Dimmling}			Presentation to New Hampshire Insurance Department - Runoff Status/Analysis of The Home with handwritten notations.	Oversight
48	8/27/1996	Rudy Dimmling	Richard Hershman	Charles Callahan, Peter Johnson, Al Lawrence, David Nichols, Joseph DeVito	Memo Re: Comparison of Forecasted Operating Expenses with attachment.	Oversight
49	4/30/2001	Peter Johnson	Michael Averill		Letter re The Home and REM Financial Information. (See #75.)	Supervision/ Oversight
50	4/11/2001	Michael Averill	David Nichols	Paula Rogers, Thomas Burke, Roger Moak	Memo with handwritten notations by Roger Moak re The Home. (See #77.)	Supervision/ Oversight
51	4/30/2001	Peter Johnson, Charles Callahan	David Nichols	Michael Averill	Memo and attachments re The Home/Various Information Requests.	Supervision/ Oversight
52	4/12/2001	Thomas Kober	Roger Moak	Charles Callahan, Peter Johnson, Michael Riney	E-mail re New Hampshire Insurance Department Inquiries. (Attachment to #72.)	Supervision/ Oversight
53	4/30/2001	Roger Moak	David Nichols		Memo re U.S.I. Re Licenses. (Attachment to #72.)	Supervision/ Oversight
54	4/30/2001	Roger Moak	Charles Callahan, Peter Johnson		Facsimile Transmittal Cover Sheet and attached draft letter (see #70) re The Home and REM Financial Information.	Supervision/ Oversight and ACP
55	4/12/2001	Roger Moak	Timothy Callahan, Alan Lawrence, Thomas Kober, Albert Morton, Arthur Wilson	Charles Callahan, Peter Johnson	Facsimile Transmittal Cover Sheet, memo and attachment (see #77) re New Hampshire Insurance Department Inquiries.	Supervision/ Oversight and ACP
56	4/11/2001	Michael Averill	David Nichols	Paula Rogers, Thomas Burke, Roger Moak	Memo with handwritten notations by Roger Moak re The Home. (See #71).	Supervision/ Oversight with handwritten ACP

NO.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
						notations.
57	8/30/1999	Rudy Dimmling	Charles Callahan, Peter Johnson	Roger Moak	Memo (in duplicate) and attachments re Home Economic Analysis. (See #93.)	Supervision/ Oversight
58	10/25/2001	{Alan Lawrence}	Roger Moak		Draft memo with handwritten notations by Roger Moak re timekeeping and expense allocation.	Supervision/ Oversight and ACP
59	10/24/2001	Alan Lawrence	Roger Moak		Draft memo with handwritten notations by Roger Moak re timekeeping and expense allocation.	Supervision/ Oversight and ACP
60	10/22/2001	Roger Moak			Draft memo re expense allocation review.	Supervision/ Oversight
61	8/30/2001	Roger Moak			Handwritten Notes re DeVito Consulting meeting and outstanding items.	Supervision/ Oversight and ACP
62	8/24/2001	Ray Tatti	Alan Lawrence	Angela Anglum, David Nichols, James Sweeney, Roger Moak	E-mail and attachment re expense allocation review meeting.	Supervision/ Oversight
63	8/28/2001	Alan Lawrence	Timothy Callahan, Roger Moak, Albert Morton, Gary Napolitano, Maria Rosqvist Croce		E-mail re DeVito Review Meeting.	Supervision/ Oversight
64	3/21/2000	Ray Tatti	Alan Lawrence	Angela Anglum, Joseph DeVito, David Nichols	Memo and attachment re Home/REM Budgets and Expenses.	Supervision/ Oversight
65	4/5/2000	Ray Tatti	Joseph Campbell	Angela Anglum, Timothy Callahan, Joseph DeVito, Alan Lawrence, David Nichols	Memo re Home Insurance Company Systems.	Supervision/ Oversight
66	3/23/2000	Ray Tatti	Timothy Callahan	Angela Anglum, Joseph DeVito, David Nichols, Alan Lawrence	Memo and attachment re Move of REM Headquarters to New Jersey.	Supervision/ Oversight
67	4/26/2000	Timothy Callahan	Ray Tatti	David Nichols, Angela Anglum, Joseph DeVito, Peter Johnson, Charles Callahan, Roger Moak, Alan	E-mail with handwritten notations by Roger Moak re Answers to Ray Tatti Questions per March 23, 2000 memo.	Supervision/ Oversight

NO.	DOC DATE	FROM/AUTHOR	TO/RECIPIENT	CC	DOC DESCRIPTION	PRIVILEGE
68	2/14/2000	Alan Lawrence	Roger Moak	Lawrence	Draft e-mail with handwritten notations by Roger Moak re 2000 Home Budget Questions.	Supervision/ Oversight and ACP
69	12/1/1998	Alan Lawrence	Ray Tatti	Timothy Callahan, Marie Rosqvist Croce, Bruce Lerner	Memo and attachments re Facilities Analysis. (See #43.)	Supervision/ Oversight
70	4/25/2000	Tim Callahan	Roger Moak		Draft e-mail from with handwritten notations by Roger Moak re Answers to Ray Tatti Questions per March 23, 2000 memo.	Supervision/ Oversight and ACP
71	4/20/2000	{IT Department}	{NHID}		Proposal re Expense Reduction Program and attachments.	Supervision/ Oversight
72	10/1/1999	Rudy Dimmling	Charles Callahan, Peter Johnson	Roger Moak	Memo and attachments re Home Economic Analysis. (See # 78.)	Supervision/ Oversight
73	Undated		Ray Tatti		Report re REM Responses to De Vito Consulting Draft Report - October 2001. (Duplicate - See #53.)	Supervision/ Oversight
74	11/8/2002	Roger Moak	Michael Averill		Facsimile Transmittal Cover Sheet and attached marked draft report re Home Contribution to ZRMS LTIP Pool.	Supervision/ Oversight
75	8/8/2002	Peter Johnson	Michael Averill	Roger Moak	Draft report re Home Contribution to ZRMS LTIP Pool with handwritten notations by Roger Moak.	Supervision/ Oversight
76	5/15/2002	Roger Moak	Michael Averill		Documents re 2001 Incentive Plan.	Supervision/ Oversight
77	5/9/2002	Peter Johnson, Charles Callahan	Paula Rogers	Michael Averill, Roger Moak	Letter and attachment re REM LTIP Calculation. (See #99.)	Supervision/ Oversight
78	5/9/2002	Roger Moak	Paula Rogers, Michael Averill		Facsimile Transmittal Cover Sheets re #98.	Supervision/ Oversight
79	5/3/2002	Peter Johnson, Charles Callahan	Roger Moak		Draft letter with handwritten notations by Roger Moak re REM LTIP Calculation.	Supervision/ Oversight and ACP
80	5/2/2002	Peter Johnson, Charles Callahan	Roger Moak		Marked draft letter re REM LTIP Calculation.	Supervision/ Oversight and ACP
81	5/2/2002	Peter Johnson, Charles Callahan	Roger Moak		Draft letter re REM LTIP Calculation.	Supervision/ Oversight and ACP
82	4/26/2002	Peter Johnson, Charles Callahan	Roger Moak		Draft letter re REM LTIP Calculation.	Supervision/ Oversight and ACP
83	4/26/2002	Peter Johnson, Charles Callahan	Roger Moak		Draft letter with handwritten notations by Roger Moak re REM LTIP Calculation.	Supervision/ Oversight and ACP

<b>NO.</b>	<b>DOC DATE</b>	<b>FROM/AUTHOR</b>	<b>TO/RECIP</b>	<b>CC</b>	<b>DOC DESCRIPTION</b>	<b>PRIVILEGE</b>
84	4/25/2002	Roger Moak	Peter Johnson, Charles Callahan		Draft letter with handwritten notations by Roger Moak re REM LTIP Calculation.	Supervision/ Oversight and ACP
85	Undated	{Rudy Dimmling}	{Roger Moak}		Home Insurance Cash Flow Projections exhibit.	Supervision/ Oversight
86	Undated	{Rudy Dimmling}	{Roger Moak}		Document re Home Insurance Cash Flow Projections.	Supervision/ Oversight
87	1997 - 2003	Various	NHID Representative		Requests for prior approval submitted to the New Hampshire Insurance Department Representative pursuant to the Order of Supervision dated March 3, 1997, including attachments thereto and supporting documentation.	Supervision/ Oversight (\$400-A:37; 401-B:7)